

Bay Area Air Quality Management District

939 Ellis Street
San Francisco, CA 94109
(415) 771-6000

Proposed

MAJOR FACILITY REVIEW PERMIT

Issued To:

Pechiney Plastic Packaging, Inc.
Facility #A0273

Facility Address:

6590 Central Avenue
Newark CA 94560

Mailing Address:

6590 Central Avenue
Newark CA 94560

Responsible Official

Dick Edgeworth, Plant Manager
(510) 797-3710

Facility Contact

Jennifer Dziejowski, Process Engineer
(510) 797-3710, ext. 357

Type of Facility:	Flexible Packaging Manufacturing	BAAQMD Permit Division Contact:
Primary SIC:	2671, 2754	Dennis Jang <u>Allan Chiu</u>
Product:	Flexible Packaging/Plastic Bottles	

ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Ellen Garvey <u>William C. Norton</u> , Executive Office/Air Pollution Control Officer	
	Date

TABLE OF CONTENTS

I.	STANDARD CONDITIONS	3
II.	EQUIPMENT	7
III.	GENERALLY APPLICABLE REQUIREMENTS.....	11
IV.	SOURCE-SPECIFIC APPLICABLE REQUIREMENTS	13
V.	SCHEDULE OF COMPLIANCE.....	40
VI.	PERMIT CONDITIONS	40
VII.	APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS.....	50
VIII.	TEST METHODS.....	85
IX.	PERMIT SHIELD.....	86
X.	GLOSSARY	87
XI.	APPLICABLE STATE IMPLEMENTATION PLAN.....	91

I. STANDARD CONDITIONS

A. Administrative Requirements

The permit holder shall comply with all applicable requirements in the following regulations:

BAAQMD Regulation 1 - General Provisions and Definitions
(as amended by the District Board on 5/2/01);
SIP Regulation 1 - General Provisions and Definitions
(as approved by EPA through 8/276/28/99);
BAAQMD Regulation 2, Rule 1 - Permits, General Requirements
(as amended by the District Board on 8/1/01);
SIP Regulation 2, Rule 1 - Permits, General Requirements
(as approved by EPA through 2/251/26/99);
BAAQMD Regulation 2, Rule 2 - Permits, New Source Review
(as amended by the District Board on 5/17/00);
SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration
(as approved by EPA through 2/251/26/99);
BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking
(as amended by the District Board on 5/17/00);
SIP Regulation 2, Rule 4 - Permits, Emissions Banking
(as approved by EPA through 2/251/26/99); and
BAAQMD Regulation 2, Rule 6 - Permits, Major Facility Review
(as amended by the District Board on 5/2/01).

B. Conditions to Implement Regulation 2, Rule 6, Major Facility Review

1. This Major Facility Review Permit was issued on November 6, 2001, and expires on October 31, 2006. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than April 30, 2006 and no earlier than October 31, 2005. **If a complete application for renewal has not been submitted in accordance with this deadline, the facility may not operate after October 31, 2006.** (Regulation 2-6-307, 404.2, & 409.6; MOP Volume II, Part 3, §4.2)
2. The permit holder shall comply with all conditions of this permit. The permit consists of this document and all appendices. Any non-compliance with the terms and conditions of this permit will constitute a violation of the law and will be grounds for enforcement action; permit termination, revocation and re-issuance, or modification; or denial of a permit renewal application. (Regulation 2-6-307; MOP Volume II, Part 3, §4.11)
3. In the event any enforcement action is brought as a result of a violation of any term or condition of this permit, the fact that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with such term or condition shall not be a defense to such enforcement action. (MOP Volume II, Part 3, §4.11)
4. This permit may be modified, revoked, reopened and reissued, or terminated for cause. (Regulation 2-6-307, 409.8, 415; MOP Volume II, Part 3, §4.11)
5. The filing of a request by the facility for a permit modification, revocation and re-

I. Standard Conditions

issuance, or termination, or the filing of a notification of planned changes or anticipated non-compliance does not stay the applicability of any permit condition. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)

6. This permit does not convey any property rights of any sort, or any exclusive privilege. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
7. The permit holder shall supply within 30 days any information that the District requests in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. (Regulation 1-441, Regulation 2-6-409.4 & 501; MOP Volume II, Part 3, §4.11)
8. Any records required to be maintained pursuant to this permit which the permittee considers to contain proprietary or trade secret information shall be prominently designated as such. Copies of any such proprietary or trade secret information which are provided to the District shall be maintained by the District in a locked confidential file, provided, however, that requests from the public for the review of any such information shall be handled in accordance with the District's procedures set forth in Section 11 of the District Administrative Code. (Regulation 2-6-419; MOP Volume II, Part 3, §4.11)
9. Proprietary or trade secret information provided to EPA will be subject to the requirements of 40 CFR Part 2, Subpart B - Public Information, Confidentiality of Business Information. (40 CFR Part 2)
10. The emissions inventory submitted with the application for this Major Facility Review Permit is an estimate of actual emissions for the time period stated and is included only as one means of determining applicable requirements for emission sources. It does not establish, or constitute a basis for establishing, any new emission limitations. (MOP Volume II, Part 3, §4.11)
11. The responsible official shall certify all documents submitted by the facility pursuant to the major facility review permit. The certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. A responsible official for the facility shall sign the certifications. (MOP Volume II, Part 3, §4.11)

C. Requirement to Pay Fees

The permit holder shall pay annual fees in accordance with District Regulation 3, including Schedule P. (Regulation 2-6-402 & 409.13, Regulation 3; MOP Volume II, Part 3, §4.12)

D. Inspection and Entry

Access to Facility: The permit holder shall provide reasonable access to the facility and equipment which is subject to this permit to the APCO and/or to his or her designee. (Regulation 1-440, Regulation 2-6-409.3; MOP Volume II, Part 3, §4.14)

E. Records

1. The permit holder must provide any information, records, and reports requested or

I. Standard Conditions

- specified by the APCO. (Regulation 1-441, Regulation 2-6-409.4)
2. Notwithstanding the specific wording in any requirement, all records for federally enforceable requirements shall be maintained for at least five years from the date of entry. (Regulation 2-6-501, Regulation 3; MOP Volume II, Part 3, §4.7)

F. Monitoring Reports

Reports of all required monitoring must be submitted to the District at least once every six months, except where an applicable requirement specifies more frequent reporting. The first reporting period for this permit shall be November 6, 2001, to April 30, 2002. The report shall be submitted by May 31, 2002. Subsequent reports shall be for the following periods: May 1st through October 31st and November 1st through April 30th, and are due on the last day of the month after the end of the reporting period. All instances of non-compliance shall be clearly identified in these reports. The reports shall be certified by the responsible official as true, accurate, and complete. In addition, all instances of non-compliance with the permit shall be reported in writing to the District's Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions. The reports shall be sent to the following address:

Director of Compliance and Enforcement
939 Ellis Street
San Francisco, CA 94109
Attn: Title V Reports

(Regulation 2-6-502, Regulation 3; MOP Volume II, Part 3, §4.7)

G. Compliance Certification

Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. The certification period will be November 1st to October 31st. The certification shall be submitted by November 30th of each year. The certification must list each applicable requirement, the compliance status, whether compliance was continuous or intermittent, the method used to determine compliance, and any other specific information required by the permit. The permit holder may satisfy this requirement through submittal of District-generated Compliance Certification forms. The certification should be directed to the District's Compliance and Enforcement Division at the address above, and a copy of the certification should be sent to the Environmental Protection Agency at the following address:

Director of the Air Division
USEPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105
Attention: Air-3

I. Standard Conditions

(MOP Volume II, Part 3, §4.5 and 4.15)

H. Emergency Provisions

1. The permit holder may seek relief from enforcement action in the event of a breakdown, as defined by Regulation 1-208 of the District's Rules and Regulations, by following the procedures contained in Regulations 1-431 and 1-432. The District will thereafter determine whether breakdown relief will be granted in accordance with Regulation 1-433. (MOP Volume II, Part 3, §4.8)
2. The permit holder may seek relief from enforcement action for a violation of any of the terms and conditions of this permit by applying to the District's Hearing Board for a variance pursuant to Health and Safety Code Section 42350. The Hearing Board will determine after notice and hearing whether variance relief should be granted in accordance with the procedures and standards set forth in Health and Safety Code Section 42350 et seq. (MOP Volume II, Part 3, §4.8)
3. The granting by the District of breakdown relief or the issuance by the Hearing Board of a variance will not provide relief from federal enforcement. (MOP Volume II, Part 3, §4.8)

I. Severability

In the event that any provision of this permit is invalidated by a court or tribunal of competent jurisdiction, or by the Administrator of the EPA, all remaining portions of the permit shall remain in full force and effect. (Regulation 2-6-409.5; MOP Volume II, Part 3, §4.10)

J. Miscellaneous Conditions

1. The maximum capacity for each source as shown in Table II-A is the maximum allowable capacity. Exceedance of the maximum allowable capacity for any source is a violation of Regulation 2, Rule 1, Section 301. (Regulation 2-1-301)

II. EQUIPMENT

Table II A - Permitted Sources

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-301.

S-#	Description	Make or Type	Model	Capacity
1	Rotogravure Coater at Extruder Laminator #11	Faustel	None	Unknown <u>40 reams/hour</u>
2	Drying Oven at Extruder Laminator #11 (natural gas)	Faustel	None	600,000 BTU/hour
3	Flexographic Press P-2	Kidder	Centraflex 660	Unknown
4	Between Color Drying Oven at Flexographic Press P-2 (natural gas)	Kidder Stacy	Unknown	600,000 BTU/hour
5	Overhead Oven at Flexographic Press P-2 (natural gas)	Kidder Stacy	Unknown	600,000 BTU/hour
6	Ink Decks #1 - #3 at 6-Color Flexographic Press P-3	Mark Andy	6120	Unknown
7	Ink Decks #4 - #6 at 6-Color Flexographic Press P-3	Mark Andy	4120	Unknown
11	Gravure Station #1 at Coater #14	Black Clawson	None	Unknown
12	Gravure Station #2 at Coater #14	Black Clawson	None	Unknown
13	Drying Oven #1 at Coater #14 (natural gas)	Black Clawson	None	600,000 BTU/hour
14	Drying Oven #2 at Coater #14 (natural gas)	Black Clawson	None	600,000 BTU/hour
15	Drying Oven #3 at Coater #14 (natural gas)	Black Clawson	None	600,000 BTU/hour
17	Primer Station #1 at Extruder Laminator #15	Guardian/Faustel	None	Unknown <u>60 reams/hour</u>
18	Drying Oven #1 at Extruder Laminator #15 (natural gas)	Guardian	None	600,000 BTU/hour

II. Equipment

Table II A - Permitted Sources

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-301.

S-#	Description	Make or Type	Model	Capacity
19	Between-Color Dryers #1-#3 at Press P-3 (electric)	Mark Andy	82	Unknown
20	Between-Color Dryers #4-#6 at Press P-3 (electric)	Mark Andy	82	Unknown
22	6-Color Flexographic Press P-4	NCF-4	None	Unknown 60 reams/hr
23	Drying Oven at Press P-4 (natural gas)	PCMC	None	600,000 BTU/hour
24	Primer Station #2 at Extruder Laminator #15	Inter-Roto	None	60 reams/hour
25	Drying Oven #2 at Extruder Laminator #15 (natural gas)	Inter-Roto	None	3 MM BTU/hour
26	Flexographic Press P-5 w/Between-Color Dryers and Tunnel Dryer (natural gas)	PCMC	6971	2.4 MM BTU/hour

Table II B - Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
2	Catalytic Oxidizer, Grace TEC Systems, Magnum 9	S-1 to S-7, S-11 to S-15, S-17 to S-20, S-24, S-25 & S-26	Distriet Condition #14373, parts 1 & 2	Minimum operating temperature of 500°F	Minimum POC destruction of 97% by weight
2	Catalytic Oxidizer, Grace TEC Systems, Magnum 9	S-1, S-2, S-17, S-18, S-22, S-23, S-24, S-25, & S-26	BAAQMD Condition #14373, pars 1	Minimum operating temperature of 500°F or adjusted in accordance to source test result	Operating w/overall collection & control efficiency of 75% by weight

II. Equipment

Table II B - Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
<u>2</u>	<u>Catalytic Oxidizer, Grace TEC Systems, Magnum 9</u>	<u>S-1, S-2, S- 17, S-18, S-22, S-23, S-24, S-25, & S-26</u>	<u>BAAQMD Condition #14373, part 2</u>	<u>Minimum operating temperature of 500°F or adjusted in accordance to source test result</u>	<u>outlet NMHC concentration of 10 ppm or less; if inlet concentration > 2000 ppm then destruction efficiency of at least 98.5%; if inlet concentration is between 200 & 2000 ppm then destruction efficiency of at least 97%; if inlet concentration < 200 ppm then destruction efficiency of at least 90%</u>
<u>3</u>	<u>Catalytic Oxidizer, Megtec Systems, Magnum</u>	<u>S-1, S-2, S- 17, S-18, S-22, S-23, S-24, S-25, & S-26</u>	<u>BAAQMD Condition #14373, part 1</u>	<u>Minimum operating temperature of 500°F or adjusted in accordance to source test result</u>	<u>Operating w/overall collection & control efficiency of 75% by weight</u>

II. Equipment

Table II B - Abatement Devices

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
<u>3</u>	<u>Catalytic Oxidizer, Megtec Systems, Magnum</u>	<u>S-1, S-2, S- 17, S-18, S-22, S-23, S-24, S-25, & S-26</u>	<u>BAAQMD Condition #14373, part 2</u>	<u>Minimum operating temperature of 500°F or adjusted in accordance to source test result</u>	<u>outlet NMHC concentration of 10 ppm or less; if inlet concentration > 2000 ppm then destruction efficiency of at least 98.5%; if inlet concentration is between 200 & 2000 ppm then destruction efficiency of at least 97%; if inlet concentration < 200 ppm then destruction efficiency of at least 90%</u>

III. GENERALLY APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. These requirements apply in a general manner to the facility and/or to sources exempt from the requirement to obtain a District Permit to Operate. The District has determined that these requirements would not be violated under normal, routine operations, and that no additional periodic monitoring or reporting to demonstrate compliance is warranted. In cases where a requirement, in addition to being generally applicable, is also specifically applicable to one or more sources, the requirement and the source are also included in Section IV, Source-Specific Applicable Requirements, of this permit.

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board of Directors.
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full language of SIP requirements is on EPA Region 9's website. The address is included at the end of this permit.

NOTE:

There are differences between the current BAAQMD rule and the version of the rule in the SIP. All sources must comply with both versions of the rule until US EPA has reviewed and approved (or disapproved) the District's revision of the regulation.

Table III
Generally Applicable Requirements

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 1	General Provisions and Definitions (5/2/01)	N
SIP Regulation 1	General Provisions and Definitions (8/27/99)	Y
BAAQMD Regulation 2, Rule 1	General Requirements (8/1/01)	N
BAAQMD 2-1-429	Federal Emissions Statement (6/7/95)	Y
SIP Regulation 2, Rule 1	General Requirements (8/27/99)	Y
BAAQMD Regulation 4	Air Pollution Episode Plan (3/20/91)	N
SIP Regulation 4	Air Pollution Episode Plan (8/06/90)	Y
<u>BAAQMD Regulation 5</u>	<u>Open Burning (3/6/02)</u>	<u>N</u>
<u>BAAQMD-SIP Regulation 5</u>	<u>Open Burning (11/2/94/4/98)</u>	<u>NY</u>

III. Generally Applicable Requirements

Table III
Generally Applicable Requirements

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)	Y
BAAQMD Regulation 7	Odorous Substances (3/17/82)	N
BAAQMD Regulation 8, Rule 1	Organic Compounds - General Provisions (6/15/94)	Y
BAAQMD Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (12/20/95)	Y
<u>SIP Regulation 8, Rule 3</u>	<u>Organic Compounds - Architectural Coatings (2/18/98)</u>	<u>Y</u>
BAAQMD Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (12/20/95)	N
SIP Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (3/22/95)	Y
<u>BAAQMD Regulation 8, Rule 51</u>	<u>Organic Compounds - Adhesive and Sealant Products (7/17/02)</u>	<u>N</u>
<u>SIP Regulation 8, Rule 51</u>	<u>Organic Compounds - Adhesive and Sealant Products (2/26/02)</u>	<u>Y</u>
BAAQMD Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (12/20/95)	N
BAAQMD Regulation 11, Rule 2	Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (12/4/91)	Y
BAAQMD Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (7/11/90)	Y N
<u>SIP Regulation 12, Rule 4</u>	<u>Miscellaneous Standards of Performance - Sandblasting (9/2/81)</u>	<u>Y</u>
<u>California Health and Safety Code Section 44300 et seq.</u>	<u>Air Toxics "Hot Spots" Information and Assessment Act of 1987</u>	<u>N</u>
<u>40 CFR Part 61, Subpart M</u>	<u>National Emission Standards for Hazardous Air Pollutants – National Emission Standard for Asbestos (6/19/95)</u>	<u>Y</u>

IV. SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. The requirements cited in the following tables apply in a specific manner to the indicated source(s).

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board of Directors
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full text of each permit condition cited is included in Section VI, Permit Conditions, of this permit. The full language of SIP requirements is on EPA Region 9's website. The address is included at the end of this permit. All other text may be found in the regulations themselves.

Table IV—A
Source-specific Applicable Requirements
~~S-3 FLEXOGRAPHIC PRESS P-2~~
~~S-4 BETWEEN-COLOR DRYING OVEN AT FLEXOGRAPHIC PRESS P-2~~
S-5 TUNNEL DRYER AT PRESS P-2

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 1	General Provisions and Definitions (5/17/00)		
1-523	Parametric Monitoring and Recordkeeping Procedures	Y	
BAAQMD Regulation 8, Rule 20	Graphic Arts Printing and Coating Operations (3/3/99)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	N	
8-20-308	Approved Emission Control System Requirements	Y	
8-20-309	Cleaning Product Requirements	N	
8-20-320	Solvent Evaporation Loss Minimization	Y	
8-20-320.1	—Closed storage and disposal containers	Y	
8-20-320.2	—Closed containers for organic solvents	Y	

IV. Source-specific Applicable Requirements

Table IV—A
Source-specific Applicable Requirements
S-3 FLEXOGRAPHIC PRESS P-2
S-4 BETWEEN-COLOR DRYING OVEN AT FLEXOGRAPHIC PRESS P-2
S-5 TUNNEL DRYER AT PRESS P-2

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-20-320.3	—Closed containers for inks, coatings, adhesives	Y	
8-20-503	Records		
8-20-503.1	—Current list of inks, makeup solvent, cleanup solvent	N	
8-20-503.2	—Monthly material usage	Y	
8-20-503.3	—Monthly coating, adhesive, solvent usage	Y	
8-20-503.4	—Record Retention Requirement	Y	
8-20-505	Emission Control System Monitoring (temperature)	Y	
8-20-506	Emission Control System, Recordkeeping Requirements		
8-20-506.1	—Current list of inks, coatings, adhesives, makeup solvent	Y	
8-20-506.2	—Daily ink, coating, adhesive, solvent usage	Y	
8-20-506.3	—Daily monitoring of system parameters	Y	
8-20-506.4	—Record Retention	Y	
SIP Regulation 8, Rule 20	Organic Compounds — Graphic Arts Printing and Coating Operations (12/23/97)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements		
8-20-308	Approved Emission Control System	Y	
8-20-503	Records	Y	
8-20-503.1	—Current list of inks, makeup solvent	Y	
40 CFR 63 Subpart A (MACT)	National Emission Standards for Hazardous Air Pollutants, General Provisions (12/29/92); applicable as specified in Table 1 of 40 CFR 63 Subpart KK		
63.6	Compliance with Standards and Monitoring Requirements		
63.6(e)(1)(i)	—Operation and maintenance of source and abatement device in accordance with good air pollution control practice	Y	
63.6(e)(1)(ii)	—Correction of malfunctions	Y	
63.6(e)(3)(i)	—Preparation of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(ii)	—Operation in accordance with of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(v)	—Availability of startup, shutdown and malfunction plan	Y	
63.10	Recordkeeping and reporting requirements		
63.10(b)	—General recordkeeping requirements	Y	
63.10(d)	—General reporting requirements	Y	

IV. Source-specific Applicable Requirements

Table IV—A
Source-specific Applicable Requirements
S-3 FLEXOGRAPHIC PRESS P-2
S-4 BETWEEN-COLOR DRYING OVEN AT FLEXOGRAPHIC PRESS P-2
S-5 TUNNEL DRYER AT PRESS P-2

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
40 CFR Part 63 Subpart KK	National Emission Standards for the Printing and Publishing Industry (5/30/96)		
63.825	Standards: Product and packaging rotogravure and wide web flexographic printing		
63.825(b)	Affected source emission limitations and compliance demonstration	Y	
63.825(b)(1)	Material weight fraction organic HAP content limit, as purchased basis	Y	
63.825(b)(2)	Solids containing material weight fraction organic HAP content limit, monthly average as applied basis	Y	
63.825(b)(3)(i) (A)	Solids containing material weight fraction organic HAP content limit, monthly average as applied basis	Y	
63.825(b)(3)(i) (B)	Limitation on material mass organic HAP content per mass of solids applied	Y	
63.825(b)(4)	Material weight fraction organic HAP content limit, monthly average as applied basis	Y	
63.825(b)(5)	Limitation on material mass organic HAP content per mass of solids applied, monthly average as applied basis	Y	
63.825(b)(6)	Limit on total monthly organic HAP applied, calculated equivalent basis	Y	
63.829(b)	Recordkeeping Requirements	Y	
63.830(b)	Reporting Requirements	Y	
BAAQMD Condition #14373			
Part 1(e)	Minimum A-2 Catalytic Oxidizer VOC Collection and Control Efficiency (basis: Regulation 8-20-308)	Y	
Part 2	A-2 Catalytic Oxidizer Capture Efficiency Interlock (basis: BACT, cumulative increase)	Y	
Part 3	Minimum A-2 Catalytic Oxidizer Operating Temperature (basis: BACT, cumulative increase)	Y	
Part 4	A-2 Catalytic Oxidizer Temperature Monitoring (basis: Regulation 1-521, BACT, cumulative increase)	Y	
Part 5	Preheat Requirement for A-2 Catalytic Oxidizer (basis: Regulation 2-1-403, BACT, cumulative increase)	Y	

IV. Source-specific Applicable Requirements

Table IV—A
Source-specific Applicable Requirements
~~S-3 FLEXOGRAPHIC PRESS P-2~~
~~S-4 BETWEEN-COLOR DRYING OVEN AT FLEXOGRAPHIC PRESS P-2~~
~~S-5 TUNNEL DRYER AT PRESS P-2~~

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Part 6	Collection System Integrity Inspection Requirement (basis: Regulation 2.1-403, BACT, cumulative increase)	Y	

Table IV—B
Source-specific Applicable Requirements
~~S-6 INK DECKS #1—#3 AT 6-COLOR FLEXOGRAPHIC PRESS P-3~~
~~S-7 INK DECKS #4—#6 AT 6-COLOR FLEXOGRAPHIC PRESS P-3~~
~~S-19 BETWEEN-COLOR DRYERS #1—#3 AT PRESS P-3~~
~~S-20 BETWEEN-COLOR DRYERS #4—#6 AT PRESS P-3~~

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 1	General Provisions and Definitions (5/17/00)		
1-523	Parametric Monitoring and Recordkeeping Procedures	Y	
BAAQMD Regulation 8, Rule 20	Graphic Arts Printing and Coating Operations (3/3/99)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	N	
8-20-308	Approved Emission Control System Requirements	Y	
8-20-309	Cleaning Product Requirements	N	
8-20-320	Solvent Evaporation Loss Minimization	Y	
8-20-320.1	—Closed storage and disposal containers	Y	
8-20-320.2	—Closed containers for organic solvents	Y	
8-20-320.3	—Closed containers for inks, coatings, adhesives	Y	
8-20-503	Records		
8-20-503.1	—Current list of inks, makeup solvent, cleanup solvent	N	
8-20-503.2	—Monthly material usage	Y	
8-20-503.3	—Monthly coating, adhesive, solvent usage	Y	
8-20-503.4	—Record Retention Requirement	Y	
8-20-505	Emission Control System Monitoring (temperature)	Y	
8-20-506	Emission Control System, Recordkeeping Requirements		

IV. Source-specific Applicable Requirements

Table IV—B
Source-specific Applicable Requirements
~~S-6 INK DECKS #1–#3 AT 6-COLOR FLEXOGRAPHIC PRESS P-3~~
~~S-7 INK DECKS #4–#6 AT 6-COLOR FLEXOGRAPHIC PRESS P-3~~
~~S-19 BETWEEN-COLOR DRYERS #1–#3 AT PRESS P-3~~
~~S-20 BETWEEN-COLOR DRYERS #4–#6 AT PRESS P-3~~

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-20-506.1	—Current list of inks, coatings, adhesives, makeup solvent	Y	
8-20-506.2	—Daily ink, coating, adhesive, solvent usage	Y	
8-20-506.3	—Daily monitoring of system parameters	Y	
8-20-506.4	—Record Retention	Y	
SIP Regulation 8, Rule 20	Organic Compounds—Graphic Arts Printing and Coating Operations (12/23/97)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements		
8-20-308	Approved Emission Control System	Y	
8-20-503	Records	Y	
8-20-503.1	—Current list of inks, makeup solvent	Y	
40 CFR 63 Subpart A (MACT)	National Emission Standards for Hazardous Air Pollutants, General Provisions (12/29/92); applicable as specified in Table 1 of 40 CFR 63 Subpart KK		
63.6	Compliance with Standards and Monitoring Requirements		
63.6(e)(1)(i)	—Operation and maintenance of source and abatement device in accordance with good air pollution control practice	Y	
63.6(e)(1)(ii)	—Correction of malfunctions	Y	
63.6(e)(3)(i)	—Preparation of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(ii)	—Operation in accordance with of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(v)	—Availability of startup, shutdown and malfunction plan	Y	
63.10	Recordkeeping and reporting requirements		
63.10(b)	—General recordkeeping requirements	Y	
63.10(d)	—General reporting requirements	Y	
40 CFR Part 63 Subpart KK	National Emission Standards for the Printing and Publishing Industry (5/30/96)		
63.825	Standards: Product and packaging rotogravure and wide-web flexographic printing		
63.825(b)	Affected source emission limitations and compliance demonstration	Y	
63.825(b)(1)	Material weight fraction organic HAP content limit, as-purchased basis	Y	

IV. Source-specific Applicable Requirements

Table IV—B
Source-specific Applicable Requirements
~~S-6 INK DECKS #1 – #3 AT 6-COLOR FLEXOGRAPHIC PRESS P-3~~
~~S-7 INK DECKS #4 – #6 AT 6-COLOR FLEXOGRAPHIC PRESS P-3~~
~~S-19 BETWEEN-COLOR DRYERS #1 – #3 AT PRESS P-3~~
~~S-20 BETWEEN-COLOR DRYERS #4 – #6 AT PRESS P-3~~

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
63.825(b)(2)	Solids containing material weight fraction organic HAP content limit, monthly average as applied basis	Y	
63.825(b)(3)(i) (A)	Solids containing material weight fraction organic HAP content limit, monthly average as applied basis	Y	
63.825(b)(3)(i) (B)	Limitation on material mass organic HAP content per mass of solids applied	Y	
63.825(b)(4)	Material weight fraction organic HAP content limit, monthly average as applied basis	Y	
63.825(b)(5)	Limitation on material mass organic HAP content per mass of solids applied, monthly average as applied basis	Y	
63.825(b)(6)	Limit on total monthly organic HAP applied, calculated equivalent basis	Y	
63.829(b)	Recordkeeping Requirements	Y	
63.830(b)	Reporting Requirements	Y	
BAAQMD Condition #14373			
Part 1(e)	Minimum A-2 Catalytic Oxidizer VOC Collection and Control Efficiency (basis: Regulation 8-20-308)	Y	
Part 2	A-2 Catalytic Oxidizer Capture Efficiency Interlock (basis: BACT, cumulative increase)	Y	
Part 3	Minimum A-2 Catalytic Oxidizer Operating Temperature (basis: BACT, cumulative increase)	Y	
Part 4	A-2 Catalytic Oxidizer Temperature Monitoring (basis: Regulation 1-521, BACT, cumulative increase)	Y	
Part 5	Preheat Requirement for A-2 Catalytic Oxidizer (basis: Regulation 2-1-403, BACT, cumulative increase)	Y	
Part 6	Collation System Integrity Inspection Requirement (basis: Regulation 2-1-403, BACT, cumulative increase)	Y	

IV. Source-specific Applicable Requirements

Table IV – A
Source-specific Applicable Requirements
S-22 6-COLOR FLEXOGRAPHIC PRESS P-4
S-23 DRYING OVEN AT PRESS P-4

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8, Rule 20	Graphic Arts Printing and Coating Operations (3/3/99)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	Y	
<u>8-20-308</u>	<u>Approved Emission Control System Requirements</u>	<u>Y</u>	
8-20-309	Cleaning Product Requirements	Y	
8-20-320	Solvent Evaporation Loss Minimization		
8-20-320.1	Closed storage and disposal containers	Y	
8-20-320.2	Closed containers for organic solvents	Y	
8-20-320.3	Closed containers for inks, coatings, adhesives	Y	
8-20-503	Records		
8-20-503.1	Current list of inks, makeup solvent, cleanup solvent	N	
8-20-503.2	Monthly material usage	Y	
8-20-503.3	Monthly coating, adhesive, solvent usage	Y	
8-20-503.4	Record Retention Requirement	Y	
SIP Regulation 8, Rule 20	Organic Compounds – Graphic Arts Printing and Coating Operations (9/13/00)		
8-20-503	Records	Y	
<u>8-20-505</u>	<u>Emission Control Monitoring</u>	<u>Y</u>	
<u>8-20-506</u>	<u>Emission Control Record keeping</u>	<u>Y</u>	
40 CFR 63 Subpart A (MACT)	National Emission Standards for Hazardous Air Pollutants, General Provisions (12/29/92); applicable as specified in Table 1 of 40 CFR 63 Subpart KK		
63.6	Compliance with Standards and Monitoring Requirements		
63.6(e)(1)(i)	—Operation and maintenance of source and abatement device in accordance with good air pollution control practice	Y	
63.6(e)(1)(ii)	—Correction of malfunctions	Y	
63.6(e)(3)(i)	—Preparation of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(ii)	—Operation in accordance with of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(v)	—Availability of startup, shutdown and malfunction plan	Y	
63.10	Recordkeeping and reporting requirements		
63.10(b)	—General recordkeeping requirements	Y	

IV. Source-specific Applicable Requirements

Table IV – A
Source-specific Applicable Requirements
S-22 6-COLOR FLEXOGRAPHIC PRESS P-4
S-23 DRYING OVEN AT PRESS P-4

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
63.10(d)	—General reporting requirements	Y	
40 CFR Part 63, Subpart KK	National Emission Standards for the Printing and Publishing Industry		
63.825	Standards: Product and packaging rotogravure and wide web flexographic printing		
63.825(b)	Affected source emission limitations and compliance demonstration	Y	
63.825(b)(1)	Material weight fraction organic HAP content limit, as purchased basis	Y	
63.825(b)(2)	Solids containing material weight fraction organic HAP content limit, monthly average as applied basis	Y	
63.825(b)(3)(i) (A)	Solids containing material weight fraction organic HAP content limit, monthly average as applied basis	Y	
63.825(b)(3)(i) (B)	Limitation on material mass organic HAP content per mass of solids applied	Y	
63.825(b)(4)	Material weight fraction organic HAP content limit, monthly average as applied basis	Y	
63.825(b)(5)	Limitation on material mass organic HAP content per mass of solids applied, monthly average as applied basis	Y	
63.825(b)(6)	Limit on total monthly organic HAP applied, calculated equivalent basis	Y	
63.829(b)	Recordkeeping Requirements	Y	
63.830(b)	Reporting Requirements	Y	
63.820(a)(2)	Standards: Product and packaging rotogravure and wide-web flexographic printing as an area source facility	Y	
63.820(a)(2)(i)	Maintain HAP emissions of less than 10 TPY	Y	
63.820(a)(2)(ii)	Maintain combined HAP emissions of less than 25 TPY	Y	
63.829(d)	Recordkeeping and Calculation Requirements	Y	
63.830(b)(1)	Reporting Requirements	Y	
BAAQMD Condition #1955			
Part 1	Ink VOC content limitation (basis: cumulative increase)	Y	
Part 2	Ink, Solvent Usage Recordkeeping Requirement (basis: cumulative increase)		

IV. Source-specific Applicable Requirements

Table IV – A
Source-specific Applicable Requirements
S-22 6-COLOR FLEXOGRAPHIC PRESS P-4
S-23 DRYING OVEN AT PRESS P-4

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Part 3	Daily and annual VOC mass emission limitation (basis: cumulative increase)	Y	
Part 4	Reports of exceedances (basis: 1-420)	Y	
Part 5	NPOC Usage Prohibition (basis: cumulative increase)	Y	
BAAQMD Condition #14373			
Part 1c	Minimum overall A-2 and A-3 control efficiency (basis: cumulative increase)	Y	
Part 2	Minimum A-2 and A-3 destruction efficiency (basis: cumulative increase)		
Part 3	Abatement requirement for non-compliance material defined by Reg.8-302 (basis: cumulative increase)	Y	
Part 4	A-2 and A-3 capture efficiency interlock (basis: BACT)	Y	
Part 5	Minimum inlet catalyst temp. for A-2 and A-3 (basis: cumulative increase)	Y	
Part 6	A-2 and A-3 catalytic oxidizer temp. monitoring (basis: cumulative increase)	Y	
Part 7	A-2 and A-3 catalytic oxidizer preheat requirement (basis: BACT)	Y	
Part 8	Collection system integrity inspection requirement	Y	
Part 9	Annual VOC emission limitation (basis: cumulative increase)	Y	
Part 12	Record keeping requirement (basis: cumulative increase)	Y	
Part 13	Violation reporting requirement (basis: 1-420)	Y	
Part 14	Source test requirement (basis: BACT)	Y	
Part 15	Source test requirement (basis: BACT)	Y	
BAAQMD Condition #20229			
Part 1	HAPs Limitation (basis: 40 CFR 63, Subpart KK; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)	Y	
Part 2	HAPs record keeping (basis: 40 CFR 63, Subpart KK; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)	Y	

IV. Source-specific Applicable Requirements

Table IV – B
Source-specific Applicable Requirements
S-26 Flexographic Printing Press P-5 w/Between-Color Dryers and Tunnel Dryer

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 1	General Provisions and Definitions (5/2/01)		
<u>1-523</u>	<u>Parametric monitoring and Recordkeeping Procedures</u>	<u>N</u>	
<u>1-523.1</u>	<u>Parametric monitor periods of in operation</u>	<u>Y</u>	
<u>1-523.2</u>	<u>Limits on periods of in operation</u>	<u>Y</u>	
<u>1-523.3</u>	<u>Reports of Violations</u>	<u>N</u>	
<u>1-523.4</u>	<u>Records</u>	<u>Y</u>	
<u>1-523.5</u>	<u>Maintenance and calibration</u>	<u>N</u>	
SIP Regulation 1	General Provisions and Definitions (6/28/99)		
<u>1-523</u>	<u>Parametric monitoring and Recordkeeping Procedures</u>	<u>Y¹</u>	
<u>1-523.3</u>	<u>Reports of Violations</u>	<u>Y¹</u>	
<u>1-523.5</u>	<u>Maintenance and calibration</u>	<u>Y¹</u>	
BAAQMD Regulation 8, Rule 20	Graphic Arts Printing and Coating Operations (3/3/99)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	Y	
8-20-308	Approved Emission Control System Requirements	Y	
8-20-309	Cleaning Product Requirements	Y	
<u>8-20-320</u>	<u>Solvent Evaporation Loss Minimization</u>		
<u>8-20-320.1</u>	<u>Closed storage and disposal containers</u>	<u>Y</u>	
<u>8-20-320.2</u>	<u>Closed containers for organic solvents</u>	<u>Y</u>	
<u>8-20-320.3</u>	<u>Closed containers for inks, coatings, adhesives</u>	<u>Y</u>	
<u>8-20-503</u>	<u>Records</u>		
<u>8-20-503.1</u>	<u>Current list of inks, makeup solvent, cleanup solvent</u>	<u>N</u>	
<u>8-20-503.2</u>	<u>Monthly material usage</u>	<u>Y</u>	
<u>8-20-503.3</u>	<u>Monthly coating, adhesive, solvent usage</u>	<u>Y</u>	
<u>8-20-503.4</u>	<u>Record Retention Requirement</u>	<u>Y</u>	
SIP Regulation 8, Rule 20	Organic Compounds – Graphic Arts Printing and Coating Operations (9/13/00)		
<u>8-20-503</u>	<u>Records</u>	<u>Y</u>	
<u>8-20-505</u>	<u>Emission Control Monitoring</u>	<u>Y</u>	
<u>8-20-506</u>	<u>Emission Control Record keeping</u>	<u>Y</u>	

IV. Source-specific Applicable Requirements

Table IV – B
Source-specific Applicable Requirements
S-26 Flexographic Printing Press P-5 w/Between-Color Dryers and Tunnel Dryer

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
40 CFR Part 63, Subpart KK	National Emission Standards for the Printing and Publishing Industry		
63.825	Standards: Product and packaging rotogravure and wide-web flexographic printing		
63.825(b)	Affected source emission limitations and compliance demonstration	Y	
63.825(b)(1)	Material weight fraction organic HAP content limit, as-purchased basis	Y	
63.825(b)(2)	Solids-containing material weight fraction organic HAP content limit, monthly average as applied basis	Y	
63.825(b)(3)(i)(A)	Solids-containing material weight fraction organic HAP content limit, monthly average as applied basis	Y	
63.825(b)(3)(i)(B)	Limitation on material mass organic HAP content per mass of solids applied	Y	
63.825(b)(4)	Material weight fraction organic HAP content limit, monthly average as-applied basis	Y	
63.825(b)(5)	Limitation on material mass organic HAP content per mass of solids applied, monthly average as applied basis	Y	
63.825(b)(6)	Limit on total monthly organic HAP applied, calculated equivalent basis	Y	
63.829(b)	Recordkeeping Requirements	Y	
63.820(a)(2)	Standards: Product and packaging rotogravure and wide-web flexographic printing as an area source facility	Y	
63.820(a)(2)(i)	Maintain HAP emissions of less than 10 TPY	Y	
63.820(a)(2)(ii)	Maintain combine HAP emissions of less than 25 TPY	Y	
63.829(d)	Recordkeeping and Calculation Requirements	Y	
63.830(b)(1)	Reporting Requirements	Y	
BAAQMD Condition #15238			
Part 1	Limitation on Net VOC Usage from Waterborne Ink and Makeup Solvent (basis: cumulative increase)	Y	
Part 2	Limitation on Net VOC Usage from Solventborne Ink and Makeup Solvent (basis: cumulative increase)	Y	
Part 3	Limitation on Net Metallic Ink Usage (basis: cumulative increase)	Y	
Part 4	Limitation on Net Cleanup Solvent Usage (basis: cumulative increase)	Y	

IV. Source-specific Applicable Requirements

Table IV – B
Source-specific Applicable Requirements
S-26 Flexographic Printing Press P-5 w/Between-Color Dryers and Tunnel Dryer

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Part 5	Limitation on Annual POC Emissions from Ink and Solvent Usage (basis: cumulative increase)	Y	
Part 6	Abatement Requirement (basis: cumulative increase)	Y	
Part 7	Minimum Overall A-2 Control Efficiency (basis: cumulative increase)	Y	
Part 8	A-2 Capture Efficiency Interlock (basis: BACT)	Y	
Part 9	Source Test Requirement (basis: cumulative increase)	Y	
Part 10	Waterborne Ink VOC Content Limitation (basis: cumulative increase)	Y	
Part 11	Recordkeeping Requirement (basis: cumulative increase)	Y	
<u>BAAQMD Condition #14373</u>			
Part 14	<u>Source test requirement (basis: BACT)</u>	<u>Y</u>	
Part 15	<u>Source test requirement (basis: BACT)</u>	<u>Y</u>	
<u>BAAQMD Condition #15238</u>			
Part 1	<u>Limitation on annual VOC emissions (basis: cumulative increase)</u>	<u>Y</u>	
Part 2	<u>Abatement Requirement (basis: cumulative increase)</u>	<u>Y</u>	
Part 3	<u>Minimum Overall A-2 and A-3 Control Efficiency (basis: cumulative increase)</u>	<u>Y</u>	
Part 4	<u>Waterborne Ink VOC Content Limitation (basis: cumulative increase)</u>	<u>Y</u>	
Part 5	<u>Recordkeeping Requirement (basis: cumulative increase)</u>	<u>Y</u>	
<u>BAAQMD Condition #20229</u>			
Part 1	<u>HAPs Limitation (basis: 40 CFR 63, Subpart KK; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)</u>	<u>Y</u>	
Part 2	<u>HAPs Recordkeeping Requirement (basis: 40 CFR 63, Subpart KK; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)</u>	<u>Y</u>	

IV. Source-specific Applicable Requirements

Table IV—E
Source-specific Applicable Requirements
S-11 GRAVURE STATION #1 AT COATER #14
S-12 GRAVURE STATION #2 AT COATER #14
S-13 DRYING OVEN #1 AT COATER #14
S-14 DRYING OVEN #2 AT COATER #14
S-15 DRYING OVEN #3 AT COATER #14

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 1	General Provisions and Definitions (5/17/00)		
1-523	Parametric Monitoring and Recordkeeping Procedures	Y	
BAAQMD Regulation 8, Rule 20	Graphic Arts Printing and Coating Operations (3/3/99)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	N	
8-20-308	Approved Emission Control System Requirements	Y	
8-20-309	Cleaning Product Requirements	N	
8-20-320	Solvent Evaporation Loss Minimization		
8-20-320.1	—Closed storage and disposal containers	Y	
8-20-320.2	—Closed containers for organic solvents	Y	
8-20-320.3	—Closed containers for inks, coatings, adhesives	Y	
8-20-503	Records		
8-20-503.1	—Current list of inks, makeup solvent, cleanup solvent	N	
8-20-503.2	—Monthly material usage	Y	
8-20-503.3	—Monthly coating, adhesive, solvent usage	Y	
8-20-503.4	—Record Retention Requirement	Y	
8-20-505	Emission Control System Monitoring (temperature)	Y	
8-20-506	Emission Control System, Recordkeeping Requirements		
8-20-506.1	—Current list of inks, coatings, adhesives, makeup solvent	Y	
8-20-506.2	—Daily ink, coating, adhesive, solvent usage	Y	
8-20-506.3	—Daily monitoring of system parameters	Y	
8-20-506.4	—Record Retention	Y	
SIP Regulation 8, Rule 20	Organic Compounds—Graphic Arts Printing and Coating Operations (12/23/97)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	Y	

IV. Source-specific Applicable Requirements

Table IV—E
Source-specific Applicable Requirements
S-11 GRAVURE STATION #1 AT COATER #14
S-12 GRAVURE STATION #2 AT COATER #14
S-13 DRYING OVEN #1 AT COATER #14
S-14 DRYING OVEN #2 AT COATER #14
S-15 DRYING OVEN #3 AT COATER #14

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8.20-308	Approved Emission Control System	Y	
8.20-503	Records	Y	
8.20-503.1	—Current list of inks, makeup solvent	Y	
40 CFR 63 Subpart A (MACT)	National Emission Standards for Hazardous Air Pollutants, General Provisions (12/29/92); applicable as specified in Table 1 of 40 CFR 63 Subpart KK		
63.6	Compliance with Standards and Monitoring Requirements		
63.6(e)(1)(i)	—Operation and maintenance of source and abatement device in accordance with good air pollution control practice	Y	
63.6(e)(1)(ii)	—Correction of malfunctions	Y	
63.6(e)(3)(i)	—Preparation of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(ii)	—Operation in accordance with of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(v)	—Availability of startup, shutdown and malfunction plan	Y	
63.10	Recordkeeping and reporting requirements		
63.10(b)	—General recordkeeping requirements	Y	
63.10(d)	—General reporting requirements	Y	
40 CFR Part 63, Subpart KK	National Emission Standards for the Printing and Publishing Industry		
63.825	Standards: Product and packaging rotogravure and wide web flexographic printing		
63.825(b)	Affected source emission limitations and compliance demonstration	Y	
63.825(b)(1)	Material weight fraction organic HAP content limit, as purchased basis	Y	
63.825(b)(2)	Solids containing material weight fraction organic HAP content limit, monthly average as applied basis	Y	
63.825(b)(3)(i) (A)	Solids containing material weight fraction organic HAP content limit, monthly average as applied basis	Y	
63.825(b)(3)(i) (B)	Limitation on material mass organic HAP content per mass of solids applied	Y	
63.825(b)(4)	Material weight fraction organic HAP content limit, monthly average as applied basis	Y	

IV. Source-specific Applicable Requirements

Table IV—E
Source-specific Applicable Requirements
~~S-11 GRAVURE STATION #1 AT COATER #14~~
~~S-12 GRAVURE STATION #2 AT COATER #14~~
~~S-13 DRYING OVEN #1 AT COATER #14~~
~~S-14 DRYING OVEN #2 AT COATER #14~~
~~S-15 DRYING OVEN #3 AT COATER #14~~

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
63.825(b)(5)	Limitation on material mass organic HAP content per mass of solids applied, monthly average as applied basis	Y	
63.825(b)(6)	Limit on total monthly organic HAP applied, calculated equivalent basis	Y	
63.829(b)	Recordkeeping Requirements	Y	
63.830(b)	Reporting Requirements	Y	
BAAQMD Condition #14373			
Part 1(b)	Minimum A-2 Catalytic Oxidizer VOC Destruction Efficiency (basis: cumulative increase)	Y	
Part 3	Minimum A-2 Catalytic Oxidizer Operating Temperature (basis: BACT, cumulative increase)	Y	
Part 4	A-2 Catalytic Oxidizer Temperature Monitoring (basis: Regulation 1-521, BACT, cumulative increase)	Y	
Part 5	Preheat Requirement for A-2 Catalytic Oxidizer (basis: Regulation 2-1-403, BACT, cumulative increase)	Y	
Part 6	Collection System Integrity Inspection Requirement (basis: Regulation 2-1-403, BACT, cumulative increase)	Y	

IV. Source-specific Applicable Requirements

Table IV – C
Source-specific Applicable Requirements
S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11
S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 1	General Provisions and Definitions (5/2/01)		
<u>1-523</u>	<u>Parametric monitoring and Recordkeeping Procedures</u>	<u>N</u>	
<u>1-523.1</u>	<u>Parametric monitor periods of in operation</u>	<u>Y</u>	
<u>1-523.2</u>	<u>Limits on periods of in operation</u>	<u>Y</u>	
<u>1-523.3</u>	<u>Reports of Violations</u>	<u>N</u>	
<u>1-523.4</u>	<u>Records</u>	<u>Y</u>	
<u>1-523.5</u>	<u>Maintenance and calibration</u>	<u>N</u>	
SIP Regulation 1	General Provisions and Definitions (6/28/99)		
<u>1-523</u>	<u>Parametric monitoring and Recordkeeping Procedures</u>	<u>Y¹</u>	
<u>1-523.3</u>	<u>Reports of Violations</u>	<u>Y¹</u>	
<u>1-523.5</u>	<u>Maintenance and calibration</u>	<u>Y¹</u>	
BAAQMD Regulation 8, Rule 20	Graphic Arts Printing and Coating Operations (3/3/99)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	N	
8-20-308	Approved Emission Control System Requirements	Y	
8-20-309	Cleaning Product Requirements	N	
8-20-320	Solvent Evaporation Loss Minimization	Y	
8-20-320.1	Closed storage and disposal containers	Y	
8-20-320.2	Closed containers for organic solvents	Y	
8-20-320.3	Closed containers for inks, coatings, adhesives	Y	
8-20-503	Records		
8-20-503.1	Current list of inks, makeup solvent, cleanup solvent	N	
8-20-503.2	Monthly material usage	Y	
8-20-503.3	Monthly coating, adhesive, solvent usage	Y	
8-20-503.4	Record Retention Requirement	Y	
8-20-505	Emission Control System Monitoring (temperature)	Y	
8-20-506	Emission Control System, Recordkeeping Requirements		
8-20-506.1	Current list of inks, coatings, adhesives, makeup solvent	Y	
8-20-506.2	Daily ink, coating, adhesive, solvent usage	Y	

IV. Source-specific Applicable Requirements

Table IV – C
Source-specific Applicable Requirements
S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11
S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-20-506.3	Daily monitoring of system parameters	Y	
8-20-506.4	Record Retention	Y	
SIP Regulation 8, Rule 20	Organic Compounds – Graphic Arts Printing and Coating Operations (12/23/97)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	N	
8-20-308	Approved Emission Control System	Y	
8-20-503	Records	Y	
8-20-503.1	Current list of inks, makeup solvent	Y	
40 CFR 63 Subpart A (MACT)	National Emission Standards for Hazardous Air Pollutants, General Provisions (12/29/92); applicable as specified in Table 1 of 40 CFR 63 Subpart KK		
63.6	Compliance with Standards and Monitoring Requirements		
63.6(e)(1)(i)	—Operation and maintenance of source and abatement device in accordance with good air pollution control practice	Y	
63.6(e)(1)(ii)	—Correction of malfunctions	Y	
63.6(e)(3)(i)	—Preparation of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(ii)	—Operation in accordance with of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(v)	—Availability of startup, shutdown and malfunction plan	Y	
63.10	Recordkeeping and reporting requirements		
63.10(b)	—General recordkeeping requirements	Y	
63.10(d)	—General reporting requirements	Y	
40 CFR Part 63, Subpart KK	National Emission Standards for the Printing and Publishing Industry		
63.825	Standards: Product and packaging rotogravure and wide web flexographic printing		
63.825(b)	Affected source emission limitations and compliance demonstration	Y	
63.825(b)(1)	Material weight fraction organic HAP content limit, as purchased basis	Y	
63.825(b)(2)	Solids containing material weight fraction organic HAP content limit, monthly average as applied basis	Y	
63.825(b)(3)(i)(A)	Solids containing material weight fraction organic HAP content limit, monthly average as applied basis	Y	

IV. Source-specific Applicable Requirements

Table IV – C
Source-specific Applicable Requirements
S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11
S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
63.825(b)(3)(i) (B)	Limitation on material mass organic HAP content per mass of solids applied	Y	
63.825(b)(4)	Material weight fraction organic HAP content limit, monthly average as-applied basis	Y	
63.825(b)(5)	Limitation on material mass organic HAP content per mass of solids applied, monthly average as-applied basis	Y	
63.825(b)(6)	Limit on total monthly organic HAP applied, calculated equivalent basis	Y	
63.829(b)	Recordkeeping Requirements	Y	
63.830(b)	Reporting Requirements	Y	
63.820(a)(2)	Standards: Product and packaging rotogravure and wide-web flexographic printing as an area source facility	Y	
63.820(a)(2)(i)	Maintain HAP emissions of less than 10 TPY	Y	
63.820(a)(2)(ii)	Maintain combine HAP emissions of less than 25 TPY	Y	
63.829(d)	Recordkeeping and Calculation Requirements	Y	
63.830(b)(1)	Reporting Requirements	Y	
BAAQMD Condition #14373			
Part 1(e)	Minimum A-2 Catalytic Oxidizer VOC Collection and Control Efficiency (basis: Regulation 8-20-308)	Y	
Part 2	A-2 Catalytic Oxidizer Capture Efficiency Interlock (basis: BACT, cumulative increase)	Y	
Part 3	Minimum A-2 Catalytic Oxidizer Operating Temperature (basis: BACT, cumulative increase)	Y	
Part 4	A-2 Catalytic Oxidizer Temperature Monitoring (basis: Regulation 1-521, BACT, cumulative increase)	Y	
Part 5	Preheat Requirement for A-2 Catalytic Oxidizer (basis: Regulation 2-1-403, BACT, cumulative increase)	Y	
Part 6	Collection System Integrity Inspection Requirement (basis: Regulation 2-1-403, BACT, cumulative increase)	Y	
BAAQMD Condition #14373			

IV. Source-specific Applicable Requirements

Table IV – C
Source-specific Applicable Requirements
S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11
S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Part 1b	Minimum overall A-2 and A-3 control efficiency (basis: cumulative increase)	Y	
Part 2	Minimum A-2 and A-3 destruction efficiency (basis: cumulative increase)		
Part 3	Abatement requirement for non-compliance material defined by Reg.8-302 (basis: cumulative increase)	Y	
Part 4	A-2 and A-3 capture efficiency interlock (basis: BACT)	Y	
Part 5	Minimum inlet catalyst temp. for A-2 and A-3 (basis: cumulative increase)	Y	
Part 6	A-2 and A-3 catalytic oxidizer temp. monitoring (basis: cumulative increase)	Y	
Part 7	A-2 and A-3 catalytic oxidizer preheat requirement (basis: BACT)	Y	
Part 8	Collection system integrity inspection requirement (basis: cumulative increase)	Y	
Part 10	Annual VOC emission limitation (basis: cumulative increase)	Y	
Part 12	Record keeping requirement (basis: cumulative increase)	Y	
Part 13	Violation reporting requirement (basis: 1-420)	Y	
Part 14	Source Test Requirement (basis: BACT)	Y	
Part 15	Source Test Requirement (basis: BACT)	Y	
BAAQMD Condition #20229			
Part 1	HAPs Limitation (basis: 40 CFR 63, Subpart KK; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)	Y	
Part 2	HAPs Recordkeeping Requirement (basis: 40 CFR 63, Subpart KK; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)	Y	

IV. Source-specific Applicable Requirements

Table IV – D
Source-specific Applicable Requirements
S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15
S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 1	General Provisions and Definitions (5/2/01)		
<u>1-523</u>	<u>Parametric monitoring and Recordkeeping Procedures</u>	<u>N</u>	
<u>1-523.1</u>	<u>Parametric monitor periods of in operation</u>	<u>Y</u>	
<u>1-523.2</u>	<u>Limits on periods of in operation</u>	<u>Y</u>	
<u>1-523.3</u>	<u>Reports of Violations</u>	<u>N</u>	
<u>1-523.4</u>	<u>Records</u>	<u>Y</u>	
<u>1-523.5</u>	<u>Maintenance and calibration</u>	<u>N</u>	
SIP Regulation 1	General Provisions and Definitions (6/28/99)		
<u>1-523</u>	<u>Parametric monitoring and Recordkeeping Procedures</u>	<u>Y¹</u>	
<u>1-523.3</u>	<u>Reports of Violations</u>	<u>Y¹</u>	
<u>1-523.5</u>	<u>Maintenance and calibration</u>	<u>Y¹</u>	
BAAQMD Regulation 8, Rule 20	Graphic Arts Printing and Coating Operations (3/3/99)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	N	
8-20-308	Approved Emission Control System Requirements	Y	
8-20-309	Cleaning Product Requirements	N	
8-20-320	Solvent Evaporation Loss Minimization	Y	
8-20-320.1	Closed storage and disposal containers	Y	
8-20-320.2	Closed containers for organic solvents	Y	
8-20-320.3	Closed containers for inks, coatings, adhesives	Y	
8-20-503	Records		
8-20-503.1	Current list of inks, makeup solvent, cleanup solvent	N	
<u>8-20-503.2</u>	<u>Monthly material usage</u>	<u>Y</u>	
<u>8-20-503.3</u>	<u>Monthly coating, adhesive, solvent usage</u>	<u>Y</u>	
<u>8-20-503.4</u>	<u>Record Retention Requirement</u>	<u>Y</u>	
<u>8-20-505</u>	<u>Emission Control System Monitoring (temperature)</u>	<u>Y</u>	
<u>8-20-506</u>	<u>Emission Control System, Recordkeeping Requirements</u>		
<u>8-20-506.1</u>	<u>Current list of inks, coatings, adhesives, makeup solvent</u>	<u>Y</u>	
<u>8-20-506.2</u>	<u>Daily ink, coating, adhesive, solvent usage</u>	<u>Y</u>	

IV. Source-specific Applicable Requirements

Table IV – D
Source-specific Applicable Requirements
S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15
S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<u>8-20-506.3</u>	<u>Daily monitoring of system parameters</u>	<u>Y</u>	
<u>8-20-506.4</u>	<u>Record Retention</u>	<u>Y</u>	
SIP Regulation 8, Rule 20	Organic Compounds – Graphic Arts Printing and Coating Operations (12/23/97)		
<u>8-20-302</u>	<u>Flexographic, Gravure, Letterpress, and Lithographic Requirements</u>	<u>N</u>	
<u>8-20-308</u>	<u>Approved Emission Control System</u>	<u>Y</u>	
<u>8-20-503</u>	<u>Records</u>	<u>Y</u>	
<u>8-20-503.1</u>	<u>Current list of inks, makeup solvent</u>	<u>Y</u>	
40 CFR 63 Subpart A (MACT)	National Emission Standards for Hazardous Air Pollutants, General Provisions (12/29/92); applicable as specified in Table 1 of 40 CFR 63 Subpart KK		
63.6	Compliance with Standards and Monitoring Requirements		
63.6(e)(1)(i)	—Operation and maintenance of source and abatement device in accordance with good air pollution control practice	Y	
63.6(e)(1)(ii)	—Correction of malfunctions	Y	
63.6(e)(3)(i)	—Preparation of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(ii)	—Operation in accordance with of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(v)	—Availability of startup, shutdown and malfunction plan	Y	
63.10	Recordkeeping and reporting requirements		
63.10(b)	—General recordkeeping requirements	Y	
63.10(d)	—General reporting requirements	Y	
40 CFR Part 63, Subpart KK	National Emission Standards for the Printing and Publishing Industry		
63.825	Standards: Product and packaging rotogravure and wide web flexographic printing		
63.825(b)	Affected source emission limitations and compliance demonstration	Y	
63.825(b)(1)	Material weight fraction organic HAP content limit, as purchased basis	Y	
63.825(b)(2)	Solids containing material weight fraction organic HAP content limit, monthly average as applied basis	Y	
63.825(b)(3)(i)(A)	Solids containing material weight fraction organic HAP content limit, monthly average as applied basis	Y	

IV. Source-specific Applicable Requirements

Table IV – D
Source-specific Applicable Requirements
S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15
S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
63.825(b)(3)(i) (B)	Limitation on material mass organic HAP content per mass of solids applied	Y	
63.825(b)(4)	Material weight fraction organic HAP content limit, monthly average as-applied basis	Y	
63.825(b)(5)	Limitation on material mass organic HAP content per mass of solids applied, monthly average as-applied basis	Y	
63.825(b)(6)	Limit on total monthly organic HAP applied, calculated equivalent basis	Y	
63.829(b)	Recordkeeping Requirements	Y	
63.830(b)	Reporting Requirements	Y	
63.820(a)(2)	Standards: Product and packaging rotogravure and wide-web flexographic printing as an area source facility	Y	
63.820(a)(2)(i)	Maintain HAP emissions of less than 10 TPY	Y	
63.820(a)(2)(ii)	Maintain combine HAP emissions of less than 25 TPY	Y	
63.829(d)	Recordkeeping and Calculation Requirements	Y	
63.830(b)(1)	Reporting Requirements	Y	
BAAQMD Condition #14373			
Part 1(e)	Minimum A-2 Catalytic Oxidizer VOC Collection and Control Efficiency (basis: Regulation 8-20-308)	Y	
Part 2	A-2 Catalytic Oxidizer Capture Efficiency Interlock (basis: BACT, cumulative increase)	Y	
Part 3	Minimum A-2 Catalytic Oxidizer Operating Temperature (basis: BACT, cumulative increase)	Y	
Part 4	A-2 Catalytic Oxidizer Temperature Monitoring (basis: Regulation 1-521, BACT, cumulative increase)	Y	
Part 5	Preheat Requirement for A-2 Catalytic Oxidizer (basis: Regulation 2-1-403, BACT, cumulative increase)	Y	
Part 6	Collection System Integrity Inspection Requirement (basis: Regulation 2-1-403, BACT, cumulative increase)	Y	
BAAQMD Condition #14373			

IV. Source-specific Applicable Requirements

Table IV – D
Source-specific Applicable Requirements
S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15
S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<u>Part 1a</u>	<u>Minimum overall A-2 and A-3 control efficiency (basis: cumulative increase)</u>	<u>Y</u>	
<u>Part 2</u>	<u>Minimum A-2 and A-3 destruction efficiency (basis: cumulative increase)</u>		
<u>Part 3</u>	<u>Abatement requirement for non-compliance material defined by Reg.8-302 (basis: cumulative increase)</u>	<u>Y</u>	
<u>Part 4</u>	<u>A-2 and A-3 capture efficiency interlock (basis: BACT)</u>	<u>Y</u>	
<u>Part 5</u>	<u>Minimum inlet catalyst temp. for A-2 and A-3 (basis: cumulative increase)</u>	<u>Y</u>	
<u>Part 6</u>	<u>A-2 and A-3 catalytic oxidizer temp. monitoring (basis: cumulative increase)</u>	<u>Y</u>	
<u>Part 7</u>	<u>A-2 and A-3 catalytic oxidizer preheat requirement (basis: BACT)</u>	<u>Y</u>	
<u>Part 8</u>	<u>Collection system integrity inspection requirement (basis: cumulative increase)</u>	<u>Y</u>	
<u>Part 12</u>	<u>Record keeping requirement (basis: cumulative increase)</u>	<u>Y</u>	
<u>Part 13</u>	<u>Violation reporting requirement (basis: 1-420)</u>	<u>Y</u>	
<u>Part 14</u>	<u>Source Test Requirement (basis: BACT)</u>	<u>Y</u>	
<u>Part 15</u>	<u>Source test requirement (basis: BACT)</u>	<u>Y</u>	
<u>BAAQMD Condition #20229</u>			
<u>Part 1</u>	<u>HAPs Limitation (basis: 40 CFR 63, Subpart KK; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)</u>	<u>Y</u>	
<u>Part 2</u>	<u>HAPs record keeping (basis: 40 CFR 63, Subpart KK; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)</u>	<u>Y</u>	

IV. Source-specific Applicable Requirements

Table IV – E
Source-specific Applicable Requirements
S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15
S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 1	General Provisions and Definitions (5/2/01)		
<u>1-523</u>	<u>Parametric monitoring and Recordkeeping Procedures</u>	<u>N</u>	
<u>1-523.1</u>	<u>Parametric monitor periods of in operation</u>	<u>Y</u>	
<u>1-523.2</u>	<u>Limits on periods of in operation</u>	<u>Y</u>	
<u>1-523.3</u>	<u>Reports of Violations</u>	<u>N</u>	
<u>1-523.4</u>	<u>Records</u>	<u>Y</u>	
<u>1-523.5</u>	<u>Maintenance and calibration</u>	<u>N</u>	
SIP Regulation 1	General Provisions and Definitions (6/28/99)		
<u>1-523</u>	<u>Parametric monitoring and Recordkeeping Procedures</u>	<u>Y¹</u>	
<u>1-523.3</u>	<u>Reports of Violations</u>	<u>Y¹</u>	
<u>1-523.5</u>	<u>Maintenance and calibration</u>	<u>Y¹</u>	
BAAQMD Regulation 8, Rule 20	Graphic Arts Printing and Coating Operations (3/3/99)		
8-20-302	Flexographic, Gravure, Letterpress, and Lithographic Requirements	N	
8-20-308	Approved Emission Control System Requirements	Y	
8-20-309	Cleaning Product Requirements	Y	
8-20-320	Solvent Evaporation Loss Minimization		
8-20-320.1	Closed storage and disposal containers	Y	
8-20-320.2	Closed containers for organic solvents	Y	
8-20-320.3	Closed containers for inks, coatings, adhesives	Y	
8-20-503	Records		
8-20-503.1	Current list of inks, makeup solvent, cleanup solvent	N	
8-20-503.2	Monthly material usage	Y	
8-20-503.3	Monthly coating, adhesive, solvent usage	Y	
8-20-503.4	Record Retention Requirement	Y	
<u>8-20-505</u>	<u>Emission Control System Monitoring (temperature)</u>	<u>Y</u>	
<u>8-20-506</u>	<u>Emission Control System, Recordkeeping Requirements</u>		
<u>8-20-506.1</u>	<u>Current list of inks, coatings, adhesives, makeup solvent</u>	<u>Y</u>	

IV. Source-specific Applicable Requirements

Table IV – E
Source-specific Applicable Requirements
S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15
S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-20-506.2	<u>Daily ink, coating, adhesive, solvent usage</u>	<u>Y</u>	
8-20-506.3	<u>Daily monitoring of system parameters</u>	<u>Y</u>	
8-20-506.4	<u>Record Retention</u>	<u>Y</u>	
SIP Regulation 8, Rule 20	Organic Compounds – Graphic Arts Printing and Coating Operations (12/23/97)		
8-20-302	<u>Flexographic, Gravure, Letterpress, and Lithographic Requirements</u>	<u>Y</u>	
8-20-308	<u>Approved Emission Control System</u>	<u>Y</u>	
8-20-503	<u>Records</u>	<u>Y</u>	
8-20-503.1	<u>Current list of inks, makeup solvent</u>	<u>Y</u>	
40 CFR 63 Subpart A (MACT)	National Emission Standards for Hazardous Air Pollutants, General Provisions (12/29/92); applicable as specified in Table 1 of 40 CFR 63 Subpart KK		
63.6	Compliance with Standards and Monitoring Requirements		
63.6(e)(1)(i)	—Operation and maintenance of source and abatement device in accordance with good air pollution control practice	Y	
63.6(e)(1)(ii)	—Correction of malfunctions	Y	
63.6(e)(3)(i)	—Preparation of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(ii)	—Operation in accordance with of startup, shutdown and malfunction plan	Y	
63.6(e)(3)(v)	—Availability of startup, shutdown and malfunction plan	Y	
63.10	Recordkeeping and reporting requirements		
63.10(b)	—General recordkeeping requirements	Y	
63.10(d)	—General reporting requirements	Y	
40 CFR Part 63, Subpart KK	National Emission Standards for the Printing and Publishing Industry		
63.825	Standards: Product and packaging rotogravure and wide web flexographic printing		
63.825(b)	Affected source emission limitations and compliance demonstration	Y	
63.825(b)(1)	Material weight fraction organic HAP content limit, as purchased basis	Y	
63.825(b)(2)	Solids containing material weight fraction organic HAP content limit, monthly average as applied basis	Y	
63.825(b)(3)(i)(A)	Solids containing material weight fraction organic HAP content limit, monthly average as applied basis	Y	

IV. Source-specific Applicable Requirements

Table IV – E
Source-specific Applicable Requirements
S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15
S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
63.825(b)(3)(i) (B)	Limitation on material mass organic HAP content per mass of solids applied	Y	
63.825(b)(4)	Material weight fraction organic HAP content limit, monthly average as-applied basis	Y	
63.825(b)(5)	Limitation on material mass organic HAP content per mass of solids applied, monthly average as-applied basis	Y	
63.825(b)(6)	Limit on total monthly organic HAP applied, calculated equivalent basis	Y	
63.829(b)	Recordkeeping Requirements	Y	
63.830(b)	Reporting Requirements	Y	
63.820(a)(2)	Standards: Product and packaging rotogravure and wide-web flexographic printing as an area source facility	Y	
63.820(a)(2)(i)	Maintain HAP emissions of less than 10 TPY	Y	
63.820(a)(2)(ii)	Maintain combine HAP emissions of less than 25 TPY	Y	
63.829(d)	Recordkeeping Requirements	Y	
63.830(b)(1)	Reporting Requirements	Y	
BAAQMD Condition #14373			
Part 1(a)	Minimum A-2 Catalytic Oxidizer VOC Destruction Efficiency (basis: BACT, cumulative increase)	Y	
Part 3	Minimum A-2 Catalytic Oxidizer Operating Temperature (basis: BACT, cumulative increase)	Y	
Part 4	A-2 Catalytic Oxidizer Temperature Monitoring (basis: Regulation 1-521, BACT, cumulative increase)	Y	
Part 5	Preheat Requirement for A-2 Catalytic Oxidizer (basis: Regulation 2-1-403, BACT, cumulative increase)	Y	
Part 6	Collection System Integrity Inspection Requirement (basis: Regulation 2-1-403, BACT, cumulative increase)	Y	
Part 7	Primer, Coating, and Solvent Usage Recordkeeping Requirement (basis: cumulative increase)	Y	
Part 8	Limitation on Daily and Annual VOC emissions (basis: cumulative increase)	Y	
Part 9	Violation Reporting Requirement (basis: Regulation 1-420)	Y	

IV. Source-specific Applicable Requirements

Table IV – E
Source-specific Applicable Requirements
S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15
S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<u>BAAQMD Condition #14373</u>			
<u>Part 1a</u>	<u>Minimum overall A-2 and A-3 control efficiency (basis: cumulative increase)</u>	<u>Y</u>	
<u>Part 2</u>	<u>Minimum A-2 and A-3 destruction efficiency (basis: cumulative increase)</u>		
<u>Part 3</u>	<u>Abatement requirement for non-compliance material defined by Reg.8-302 (basis: cumulative increase)</u>	<u>Y</u>	
<u>Part 4</u>	<u>A-2 and A-3 capture efficiency interlock (basis: BACT)</u>	<u>Y</u>	
<u>Part 5</u>	<u>Minimum inlet catalyst temp. for A-2 and A-3 (basis: cumulative increase)</u>	<u>Y</u>	
<u>Part 6</u>	<u>A-2 and A-3 catalytic oxidizer temp. monitoring (basis: cumulative increase)</u>	<u>Y</u>	
<u>Part 7</u>	<u>A-2 and A-3 catalytic oxidizer preheat requirement (basis: BACT)</u>	<u>Y</u>	
<u>Part 8</u>	<u>Collection system integrity inspection requirement (basis: cumulative increase)</u>	<u>Y</u>	
<u>Part 11</u>	<u>Annual VOC emission limitation (basis: cumulative increase)</u>	<u>Y</u>	
<u>Part 12</u>	<u>Record keeping requirement (basis: cumulative increase)</u>	<u>Y</u>	
<u>Part 13</u>	<u>Violation reporting requirement (basis: 1-420)</u>	<u>Y</u>	
<u>Part 14</u>	<u>Source Test Requirement (basis: BACT)</u>	<u>Y</u>	
<u>Part 15</u>	<u>Source test requirement (basis: BACT)</u>	<u>Y</u>	
<u>BAAQMD Condition #20229</u>			
<u>Part 1</u>	<u>HAPs Limitation (basis: 40 CFR 63, Subpart KK; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)</u>	<u>Y</u>	
<u>Part 2</u>	<u>HAPs record keeping (basis: 40 CFR 63, Subpart KK; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)</u>	<u>Y</u>	

V. SCHEDULE OF COMPLIANCE

The permit holder shall comply with all applicable requirements cited in this permit. The permit holder shall also comply with applicable requirements that become effective during the term of this permit on a timely basis.

VI. PERMIT CONDITIONS

Any condition that is preceded by an asterisk is not federally enforceable.

Condition #1955

~~for S-22-6-Color Flexographic Press P-4~~

- ~~1. This press shall not use any ink with a precursor organic compound (POC) content exceeding 25% by volume, as applied. (basis: cumulative increase)~~
- ~~2. Monthly usage records of inks, makeup solvent, and cleanup solvent shall be kept in a District approved log and maintained on site for at least five years from date of entry. These records shall contain the following:~~
 - ~~a. date of record~~
 - ~~b. name of each ink used~~
 - ~~c. quantity of each ink used~~
 - ~~d. amount of makeup solvent used for each ink~~
 - ~~e. amount of cleanup solvent used~~
 - ~~f. calculation of average daily emissions~~~~(basis: cumulative increase)~~
- ~~3. Maximum volatile organic compound (VOC) emissions from this equipment, including all ink, makeup solvent, and cleanup solvent usage, shall not exceed 123 pounds per calendar day or 20,500 pounds per calendar year. (basis: BACT, cumulative increase)~~
- ~~4. If the daily or annual emission limitation in condition number 3 is exceeded, the applicant shall provide a written report to the District indicating the date of the violation and the resultant excess emissions. This report shall include the cause of the violation, and proposed future measures to assure that no further violations will occur. This report shall be submitted within ten days of the date of violation. (basis: District Regulation 1-420)~~
- ~~5. This source shall not use any non-precursor organic compounds in its operation. (basis: cumulative increase)~~

VI. PERMIT CONDITIONS

~~Condition #14373~~

~~For S-1, S-2, S-3, S-4, S-5, S-6, S-7, S-11, S-12, S-13, S-14, S-15, S-17, S-18, S-19, S-20, S-24, and S-25~~

- ~~1. A-2 Catalytic Oxidizer shall maintain the following minimum VOC abatement efficiencies:~~
 - ~~a. For sources S-24 and S-25: Overall collection and control (destruction) efficiency of at least 90% (mass basis) when complying coatings (per Regulation 8-20-302) are not being used; (basis: BACT, cumulative increase)~~
 - ~~b. For sources S-11, S-12, S-13, S-14, and S-15: Destruction efficiency of at least 90% (mass basis) when complying coatings (per Regulation 8-20-302) are not being used; (basis: cumulative increase)~~
 - ~~c. For sources S-1, S-2, S-3, S-4, S-5, S-6, S-7, S-17, S-18, S-19, and S-20: Overall collection and control (destruction) efficiency of at least 75% (mass basis) when complying coatings (per Regulation 8-20-302) are not being used. (basis: 8-20-308)~~
- ~~2. The following requirement applies when complying materials are not being used at S-1, S-2, S-3, S-4, S-5, S-6, S-7, S-17, S-18, S-19, S-20, S-24, or S-25. Complying materials are defined per Regulation 8-20-302. Sources 1 through 7, 17 through 20, 24, and 25 shall be interlocked with A-2 Catalytic Oxidizer so that each source cannot operate in production mode unless both of the following requirements are being met:~~
 - ~~a. The emissions of each subject source are directed to A-2 Catalytic Oxidizer~~
 - ~~b. A-2 Catalytic Oxidizer is operating in compliance with condition 14373, parts 3 and 5.~~~~—(basis: BACT)~~
- ~~3. The inlet catalyst cell temperature of A-2 Catalytic Oxidizer shall be maintained at a minimum operating temperature of 500 degrees Fahrenheit whenever there is a pollutant stream directed to A-2. This minimum temperature may be adjusted by the District if source test data demonstrate that an alternate temperature is necessary for, or capable of, maintaining compliance with condition #14373, part 1. (basis: Regulation 1-521, BACT, cumulative increase)~~
- ~~4. A continuous temperature recorder shall be installed and maintained to monitor the A-2 catalyst inlet cell temperature. (basis: Regulation 1-521, BACT, cumulative increase)~~
- ~~5. A-2 Catalytic Oxidizer shall be designed, equipped, and operated with a preheat feature which insures that the minimum inlet catalyst cell temperature specified in~~

VI. PERMIT CONDITIONS

Condition #14373

~~For S 1, S 2, S 3, S 4, S 5, S 6, S 7, S 11, S 12, S 13, S 14, S 15, S 17, S 18, S 19, S 20, S 24, and S 25~~

~~Condition 14373, part 3 is achieved prior to the introduction of the pollutant stream to A 2. (basis: Regulation 2 1 403, BACT, cumulative increase)~~

- ~~6. To verify compliance with Condition 14373, parts 1(a), 1(c), and 2, the owner/operator of S 1, S 2, S 3, S 4, S 5, S 6, S 7, S 17, S 18, S 19, S 20, S 24, and S 25 shall, on a monthly basis, inspect the operational condition of the collection system interlock and dampers (including t dampers and bypass dampers) and inspect the integrity of all ductwork and all ancillary equipment related to the emission collection system for each source to evaluate the collection system efficiency and reliability. If any interlock is found to be inoperative, the owner/operator shall test the operation of that interlock after necessary repairs are completed. All inspections and tests shall be documented in a written log subject to the review and approval of the APCO. (basis: Regulation 2 1 403, BACT, cumulative increase)~~
- ~~7. Monthly records of primers, coatings, makeup solvent, and cleanup solvent usage at source S 24 and S 25 shall be kept in an APCO approved log and maintained on-site for at least five years from date of entry. These records shall contain the following:
 - ~~a. date of record~~
 - ~~b. name of each primer or coating used~~
 - ~~c. quantity of each primer or coating used~~
 - ~~d. amount of make-up solvent used~~
 - ~~e. amount of cleanup solvent used~~
 - ~~f. calculation of average daily emissions~~(basis: cumulative increase)~~
- ~~8. Maximum VOC emissions from sources S 24 and S 25, resulting from all coatings, primers, make-up solvent, and clean-up solvent usage shall not exceed 140 pounds per calendar day, on a monthly average basis or 12.3 tons per calendar year. (basis: cumulative increase)~~
- ~~9. If any limitation specified in part 8 is exceeded, the permit holder shall provide a written report to the APCO indicating the date of the violation and the resultant excess emissions. This report shall include the cause of the violation and proposed future measures to assure that no further violations will occur. This report shall be submitted within two weeks of the date of violation. (basis: District Regulation 1-420)~~

Condition #14373

VI. PERMIT CONDITIONS

For S-1, S-2, S-17, S-18, S-22, S-23, S-24, S-25, and S-26

- 1a. When complying materials (as defined per Regulation 8-20-302) are not being utilized at sources S-17, S-18, S-24, and S-25 the owner/operator shall not operate these sources unless A-2 and/or A-3 catalytic oxidizer are operating with an overall collection and control efficiency of at least 75% (by weight). (basis: Regulation 8-20-302)
- 1b. When complying materials (as defined per Regulation 8-2-302) are not utilized at sources S-1 and S-2, the owner/operator shall not operate these sources unless A-2 and /or A-3 catalytic oxidizer are operating with an overall collection and control efficiency of at least 87.3% (by weight). (basis: cumulative increase)
- 1c. When complying materials (as defined per Regulation 8-2-302) are not utilized at sources S-22 and S-23, the owner/operator shall not operate these sources unless A-2 and /or A-3 catalytic oxidizer are operating with an overall collection and control efficiency of at least 77.6% (by weight). (basis: cumulative increase)
2. The owner/operator shall not operate the A-2 and/or A-3 catalytic oxidizer unless one of the following is met: (basis: BACT)
 - a. an outlet non-methane hydrocarbon (NMHC) concentration of 10 ppmv or less, OR
 - b. one of the following, as determined by the inlet NMHC concentration into A-2 and/or A-3:
 1. NMHC destruction efficiency of at least 98.5% if inlet NMHC concentration is greater than 2000 ppmv; OR
 2. NMHC destruction efficiency of at least 97% if inlet NMHC concentration is greater than 200 pmv, but no greater than 2000 ppmv; OR
 3. NMHC destruction efficiency of at least 90% if inlet NMHC concentration is 200 ppmv or less.
3. Organic emissions from all sources shall be abated by A-2 and/or A-3 whenever any of these sources applies materials that do not comply with the limits in Regulation 8-20-302. (basis: Regulation 8-20-308 and BACT)
4. The following requirement applies when complying materials are not being used at S-1, S-2, S-17, S-18, S-22, S-23, S-24, or S-25. Complying materials are defined per Regulation 8-20-302. All sources shall be interlocked with A-2 and/or A-3 Catalytic Oxidizer so that the sources cannot operate in production mode unless both of the following requirements are being met:
 - a. The emissions of each subject source are directed to A-2 and/or A-3 Catalytic Oxidizer

Condition #14373

For S-1, S-2, S-17, S-18, S-22, S-23, S-24, S-25, and S-26

VI. PERMIT CONDITIONS

- b. A-2 and A-3 Catalytic Oxidizers are operating in compliance with condition 14373, parts 5 and 7.
(basis: BACT)
5. The inlet catalyst cell temperature of A-2 and/or A-3 Catalytic Oxidizer shall be maintained at a minimum operating temperature of 500 degrees Fahrenheit whenever there is a pollutant stream directed to A-2 and/or A-3. The minimum temperatures may be adjusted by the District if source test data demonstrate that an alternate temperature is necessary for, or capable of, maintaining compliance with condition #14373, parts 1 and 2. (basis: cumulative increase)
6. The owner/operator shall install and maintain a continuous temperature recorder to monitor the A-2 and A-3 catalyst inlet cell temperature.
(basis: cumulative increase)
7. A-2 and A-3 Catalytic Oxidizer shall be designed, equipped, and operated with a preheat feature which insures that the minimum inlet catalyst cell temperature specified in condition 14373, part 5, is achieved prior to the introduction of the pollutant stream to A-2 and/or A-3. (basis: BACT)
8. To verify compliance with Condition 14373, parts 1, 2, and 4, the owner/operator of S-1, S-2, S-17, S-18, S-22, S-23, S-24, and S-25 shall inspect and evaluate on a monthly basis the collection system interlock, ducting, dampers (including t-dampers and bypass dampers), and all ancillary equipment related to the emission collection system for each source to insure the collection system integrity and reliability.
(basis: cumulative increase)
9. Maximum VOC emissions from sources S-22 and S-23, resulting from all coatings, primers, make-up solvent, and cleanup solvent usage shall not exceed 39 tons per rolling 12-month year. (basis: cumulative increase)
10. Maximum VOC emissions from sources S-1 and S-2, resulting from all coatings, primers, make-up solvent, and cleanup solvent usage shall not exceed 6.63 tons per rolling 12-month year. (basis: cumulative increase)
11. Maximum VOC emissions from sources S-24 and S-25, resulting from all coatings, primers, make-up solvent, and cleanup solvent usage shall not exceed 12.3 tons per rolling 12-month year. (basis cumulative increase)

Condition #14373

For S-1, S-2, S-17, S-18, S-22, S-23, S-24, S-25, and S-26

VI. PERMIT CONDITIONS

12. The owner/operator shall maintain monthly usage records of ink, primer, coating, makeup solvent, and cleanup solvent used at source S-1, S-2, S-17, S-18, S-22, S-23, S-24 and S-25. The records shall be kept in an APCO approved log and maintained on-site for at least five years from date of entry. These records shall contain the following:
- a. date of record
 - b. name of each ink, primer, or coating used
 - c. quantity of each ink, primer, or coating used
 - d. amount of make-up solvent used
 - e. amount of cleanup solvent used
 - f. calculation of daily emissions based on MSDS information and allowable overall control efficiency (when no control is used, the control efficiency shall be zero) (basis: cumulative increase)
 - g. Within 30 days of the end of each month, the owner/operator shall summarize the emissions for the last consecutive 12 months.
(Cumulative Increase)
13. If any limitation specified in parts 9, 10, and 11 ~~and 12~~ is exceeded, the permit holder shall provide a written report to the APCO indicating the date of the violation and the resultant excess emissions. This report shall include the cause of the violation and proposed future measures to assure that no further violations will occur. This report shall be submitted within 10 days of determining that a limitation has been exceeded in accordance with Standard Condition I. F.
(basis: District Regulation 1-420)
14. A source test shall be conducted within one year of the installation of the A-3 Catalytic Oxidizer to determine compliance with part 2 of this condition, Condition 15238, part 3, BAAQMD Regulation 8-20-308, and SIP Regulation 8-20-308. The Source test shall be repeated annually. The source test protocol shall be approved by the District's Source Test Manager. A copy of the test results shall be submitted to the District Staff. (basis: BACT, District Regulation 2-6-503)
15. A annual source test of the A-2 Catalytic Oxidizer shall be conducted annually to determine compliance with part 2 of this condition, Condition 15238, part 3, BAAQMD Regulation 8-20-308, and SIP Regulation 8-20-308. The source test protocol shall be approved by the District's Source Test Manager. A copy of the test results shall be submitted to the District Staff. (basis: BACT, District Regulation 2-6-503)

VI. PERMIT CONDITIONS

~~Condition #15238~~

~~For S-26~~

- ~~1. Net volatile organic compound (VOC) usage associated with waterborne ink and makeup solvent at S-26 shall not exceed 6,000 pounds totaled over any consecutive twelve-month period. (basis: cumulative increase)~~
- ~~2. Net volatile organic compound (VOC) usage associated with solventborne ink and makeup solvent usage at S-26 shall not exceed 254,720 pounds totaled over any consecutive twelve-month period. (basis: cumulative increase)~~
- ~~3. Net waterborne, metallic ink usage, prior to reduction with makeup fluid, at S-26 shall not exceed 2,000 pounds totaled over any consecutive twelve-month period. (basis: cumulative increase)~~
- ~~4. Net organic cleanup solvent usage at S-26 shall not exceed 8,000 pounds totaled over any consecutive twelve-month period. (basis: cumulative increase)~~
- ~~5. Total precursor organic compound (POC) emissions due to ink and cleanup solvent usage at S-26 shall not exceed 39 tons totaled over any consecutive twelve-month period. (basis: cumulative increase)~~
- ~~6. The between-color dryers and tunnel dryer associated with S-26 Flexographic Printing Press shall be abated by A-2 Catalytic Oxidizer whenever solventborne inks are applied at S-26. (basis: cumulative increase)~~

VI. PERMIT CONDITIONS

~~Condition #15238~~

~~For S-26~~

- ~~7. A-2 Catalytic Oxidizer shall achieve an overall (capture x destruction) POC control efficiency of 75% by weight when abating POC emissions from S-26. (basis: cumulative increase)~~
- ~~8. When solventborne materials are being used at S-26, it shall be interlocked with A-2 Catalytic Oxidizer so that the printing press cannot operate in production mode unless A-2 is operating in compliance with condition 15238, parts 7. (basis: BACT)~~
- ~~9. If deemed necessary by the APCO, the permit holder shall perform a District-approved source test of A-2 Catalytic Oxidizer while abating S-26 in accordance with part 6 to verify compliance with part 7. The permit holder shall submit a source test protocol to the District Permit Services Division at least two weeks prior to the planned source test date. (basis: cumulative increase)~~
- ~~10. The VOC content of waterborne inks (excluding metallic inks) applied at S-26 shall not exceed 1 pound per gallon, as applied. (basis: cumulative increase)~~
- ~~11. The owner/operator of S-26 shall maintain records of the following, VOC content and net usage on a monthly basis in a District-approved log:
 - ~~a. ink, makeup solvent, and cleanup solvent type (waterborne, solventborne, metallic)~~
 - ~~b. ink, makeup solvent, and cleanup solvent VOC content (pounds per gallon, as supplied)~~
 - ~~c. ink, makeup solvent, and cleanup solvent net usage (pounds per month)~~
 - ~~d. total POC emissions (pounds per month)~~~~
- ~~—These records shall be retained on-site for a minimum of five years from the date of entry and made available to District representatives upon request. (basis: cumulative increase, 2-6-501)~~

VI. PERMIT CONDITIONS

Condition #15238

For S-26, Flexographic Press

1. Total Volatile Organic Compound (VOC) emissions due to ink, coatings, and cleanup solvent usage at S-26 shall not exceed 39 tons totaled over any consecutive Twelve-month period. (basis: cumulative increase)
2. The between-color dryers and tunnel dryer associated with S-26 Flexographic Printing Press shall be abated by A-2 and/or A-3 Catalytic Oxidizer whenever solvent borne ink and coatings are applied at S-26. (basis: cumulative increase)
3. A-2 and/or A-3 Catalytic Oxidizer shall achieve an overall (capture x destruction) POC control efficiency of 75% by weight when abating POC emissions from S-26. (basis: cumulative increase)
4. The VOC content of waterborne inks (excluding metallic inks) applied at S-26 shall not exceed 1 pound per gallon, as-applied. (basis: cumulative increase)
5. The owner/operator of S-26 shall maintain records of the following, VOC content, and net usage on a monthly basis in a District-approved log and retained on site for a minimum of five years from the date of entry: (basis: cumulative increase)
 - a. ink, coating, makeup solvent, and cleanup solvent type (waterborne, solvent borne, metallic)
 - b. ink, coating, makeup solvent, and cleanup solvent VOC content (pounds per gallon, as-supplied)
 - c. ink, coating, makeup solvent, and cleanup solvent net usage (pounds per month)
 - d. calculation of monthly VOC emissions (pounds per month) based on a 75% overall abatement efficiency for solvent based inks. For water based inks, assume all VOC contained in water based inks are emittedIf calculated VOC emissions exceed 39 tons for 12-month consecutive period, the owner/operator shall report non-compliance in accordance with Standard Condition I. F.

Condition #20229

Facility-wide Condition for Hazardous Air Pollutants:

1. The owner/operator shall not emit more than 9 tons of any single hazardous air pollutant (HAP) or 23 tons of any combination of HAPs in any consecutive 12-month period. The sum of all glycol ethers shall be considered one HAP. (basis: 40 CFR 63, Subpart KK: [Synthetic Minor-Regulation 2-6-311](#))

Condition #20229

Facility-wide Condition for Hazardous Air Pollutants:

VI. PERMIT CONDITIONS

2. The owner/operator shall calculate and maintain records on a monthly basis of the quantities of each HAP emitted into the atmosphere from all sources at the facility. The owner/operator shall use the manufacturer's chemical speciation data or the MSDS information to calculate HAPs. For abated operations, the abatement efficiency shall be considered to be the abatement efficiency achieved in the most recent source test. For unabated operations, all HAPs shall be considered fugitive. Within 30 days of the end of each month the HAPs must be totaled on a for the last consecutive 12-month period to ensure compliance with of condition part 1. A summary of these records shall be submitted to the District representatives Director of Enforcement on an annual basis. (basis: 40 CFR 63, Subpart KK; Regulation 2-6-503; Synthetic Minor-Regulation 2-6-311)

VII. APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS

This section has been included only to summarize the applicable emission limits contained in Section IV, Source-Specific Applicable Requirements, of this permit. The following tables show the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency column indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown, using the following codes: annual (A), quarterly (Q), monthly (M), daily (D), or on an event basis (E). No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring, and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

Table VI—A
Applicable Limits and Compliance Monitoring Requirements
~~S-3 FLEXOGRAPHIC PRESS P-2~~
~~S-4 BETWEEN-COLOR DRYING OVEN AT FLEXOGRAPHIC PRESS P-2~~
S-5 TUNNEL DRYER AT PRESS P-2

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-302	Y		2.5 lb VOC/gal of ink and coating	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-302	Y		1.25 lb VOC/gal of adhesive	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 2	C	Mechanical interlock system

VII. Applicable Limits and Compliance Monitoring Requirements

Table VI—A
Applicable Limits and Compliance Monitoring Requirements
S-3 FLEXOGRAPHIC PRESS P-2
S-4 BETWEEN-COLOR DRYING OVEN AT FLEXOGRAPHIC PRESS P-2
S-5 TUNNEL DRYER AT PRESS P-2

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD 8-20-309	N		Cleaning Product VOC content limit of 7.4 lb/gal and VOC composite vapor pressure limit of 25 mm Hg @20°C	BAAQMD 8-20-503	P/M	Cleaning Product Records
	SIP 8-20-302	Y		2.5 lb VOC/gal of ink, coating, and adhesive	BAAQMD 8-20-503	P/M	Coating records
VOC	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 2	C	Mechanical interlock system
VOC	BAAQMD Condition #14373, part 1(e)	Y		75% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part 4	C	Temperature Chart Recorder
	BAAQMD Condition #14373, part 1(e)	Y		75% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part 2	C	Mechanical interlock system
	BAAQMD Condition #14373, part 1(e)	Y		75% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part 6	P/M	Collection System Integrity Inspection
	BAAQMD Condition #14373, Part 3	Y		Minimum A-2 inlet catalyst cell temperature of 500oF	BAAQMD Condition #14373 Part 4	C	Temperature Chart Recorder

VII. Applicable Limits and Compliance Monitoring Requirements

Table VI—A
Applicable Limits and Compliance Monitoring Requirements
~~S-3 FLEXOGRAPHIC PRESS P-2~~
~~S-4 BETWEEN-COLOR DRYING OVEN AT FLEXOGRAPHIC PRESS P-2~~
~~S-5 TUNNEL DRYER AT PRESS P-2~~

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
HAP	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed 5% of HAP applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed 4% of mass of all organic-containing materials applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed 20% of the mass of solids applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed a calculated equivalent allowable mass based on the organic HAP and solids content of all materials applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets

VII. Applicable Limits and Compliance Monitoring Requirements

Table VI—B
Applicable Limits and Compliance Monitoring Requirements
S-6 INK DECKS #1—#3 AT 6-COLOR FLEXOGRAPHIC PRESS P-3
S-7 INK DECKS #4—#6 AT 6-COLOR FLEXOGRAPHIC PRESS P-3
S-19 BETWEEN-COLOR DRYERS #1—#3 AT PRESS P-3
S-20 BETWEEN-COLOR DRYERS #4—#6 AT PRESS P-3

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-302	Y		2.5 lb VOC/gal of ink and coating	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-302	Y		1.25 lb VOC/gal of adhesive	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 2	C	Mechanical interlock system
	BAAQMD 8-20-309	N		Cleaning Product VOC content limit of 7.4 lb/gal and VOC composite vapor pressure limit of 25 mm Hg @20°C	BAAQMD 8-20-503	P/M	Cleaning Product Records
	SIP 8-20-302	Y		2.5 lb VOC/gal of ink, coating, and adhesive	BAAQMD 8-20-503	P/M	Coating records
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 2	C	Mechanical interlock system
VOC	BAAQMD Condition #14373, part 1(c)	Y		75% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part 4	C	Temperature Chart Recorder

VII. Applicable Limits and Compliance Monitoring Requirements

Table VI—B
Applicable Limits and Compliance Monitoring Requirements
~~S-6 INK DECKS #1–#3 AT 6-COLOR FLEXOGRAPHIC PRESS P-3~~
~~S-7 INK DECKS #4–#6 AT 6-COLOR FLEXOGRAPHIC PRESS P-3~~
~~S-19 BETWEEN-COLOR DRYERS #1–#3 AT PRESS P-3~~
~~S-20 BETWEEN-COLOR DRYERS #4–#6 AT PRESS P-3~~

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD Condition #14373, part 1(e)	Y		75% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part 2	C	Mechanical interlock system
	BAAQMD Condition #14373, part 1(e)	Y		75% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part 6	P/M	Collection System Integrity Inspection
	BAAQMD Condition #14373, Part 3	Y		Minimum A-2 inlet catalyst cell temperature of 500°F	BAAQMD Condition #14373 Part 4	C	Temperature Chart Recorder
HAP	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed 5% of HAP applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed 4% of mass of all organic-containing materials applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed 20% of the mass of solids applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets

VII. Applicable Limits and Compliance Monitoring Requirements

Table VI—B
Applicable Limits and Compliance Monitoring Requirements
S-6 INK DECKS #1—#3 AT 6-COLOR FLEXOGRAPHIC PRESS P-3
S-7 INK DECKS #4—#6 AT 6-COLOR FLEXOGRAPHIC PRESS P-3
S-19 BETWEEN-COLOR DRYERS #1—#3 AT PRESS P-3
S-20 BETWEEN-COLOR DRYERS #4—#6 AT PRESS P-3

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
HAP	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed a calculated equivalent allowable mass based on the organic HAP and solids content of all materials applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets

Table VII - A
Applicable Limits and Compliance Monitoring Requirements
S-22 6-COLOR FLEXOGRAPHIC PRESS P-4
S-23 DRYING OVEN AT PRESS P-4

Type of Limit Pollutant	Citation of Limit Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-302	Y		2.5 lb VOC/gal of ink and coating	BAAQMD 8-20-503	P/M	Coating records
VOC	BAAQMD 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 8	C	Mechanical interlock system

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII - A
Applicable Limits and Compliance Monitoring Requirements
S-22 6-COLOR FLEXOGRAPHIC PRESS P-4
S-23 DRYING OVEN AT PRESS P-4

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission-Limit Citation</u>	FE Y/N	Future Effective Date	<u>Emission-Limit</u>	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Parts 15 and 16	P/A	source test
VOC	BAAQMD 8-20-309	N		Cleaning Product VOC content limit of 7.4 lb/gal and VOC composite vapor pressure limit of 25 mm Hg @ 20°C	BAAQMD 8-20-503	P/M	Cleaning Product Records
	SIP 8-20-302	Y		2.5 lb VOC/gal of ink, coating, and adhesive	BAAQMD 8-20-503	P/M	Coating records
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency when using non- complying materials	BAAQMD Condition #14373 Part 168	C	Mechanical interlock system
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency when using non- complying materials	BAAQMD Condition #14373 Parts 15 and 16	P/A	source test
	BAAQMD Condition #1955 Part 1	Y		25% (vol) VOC content	BAAQMD Condition #1955 part 2	P/D	Ink records
VOC	BAAQMD Condition #1955 Part 3	Y		123 lb/day and 20,500 lb/yr	BAAQMD Condition #1955 part 2	P/D	Ink, makeup solvent, & cleanup solvent records

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII - A
Applicable Limits and Compliance Monitoring Requirements
S-22 6-COLOR FLEXOGRAPHIC PRESS P-4
S-23 DRYING OVEN AT PRESS P-4

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission-Limit Citation</u>	<u>FE</u> <u>Y/N</u>	<u>Future Effective Date</u>	<u>Emission-Limit</u>	<u>Monitoring Requirement Citation</u>	<u>Monitoring Frequency (P/C/N)</u>	<u>Monitoring Type</u>
VOC	BAAQMD Condition #14373, part 1c	Y		77.6% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part 6	C	Temperature Chart Recorder
	BAAQMD Condition #14373, part 1c	Y		77.6% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part 8	C	Mechanical interlock system
	BAAQMD Condition #14373, part 1c	Y		77.6% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part 8	P/M	Collection System Integrity Inspection
	BAAQMD Condition #14373, part 1c	Y		77.6% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Parts 15 and 16	P/A	source test
	BAAQMD Condition #14373, Part 2	Y		outlet NMHC concentration of 10 ppm or less; if inlet concentration > 2000 ppm then destruction efficiency of at least 98.5%; if inlet concentration is between 200 & 2000 ppm then destruction efficiency of at least 97%; if inlet concentration < 200 ppm then destruction efficiency of least 90%	BAAQMD Condition #14373 part 4	C	Source/A-2 and A-3 interlock system

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII - A
Applicable Limits and Compliance Monitoring Requirements
S-22 6-COLOR FLEXOGRAPHIC PRESS P-4
S-23 DRYING OVEN AT PRESS P-4

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission-Limit Citation</u>	<u>FE</u> <u>Y/N</u>	<u>Future Effective Date</u>	<u>Emission-Limit</u>	<u>Monitoring Requirement Citation</u>	<u>Monitoring Frequency (P/C/N)</u>	<u>Monitoring Type</u>
	<u>BAAQMD Condition #14373, Part 2</u>	<u>Y</u>		<u>outlet</u> <u>NMHC concentration of 10 ppm or less; if inlet concentration > 2000 ppm then destruction efficiency of at least 98.5%; if inlet concentration is between 200 & 2000 ppm then destruction efficiency of at least 97%; if inlet concentration < 200 ppm then destruction efficiency of at least 90%</u>	<u>BAAQMD Condition #14373 Parts 15 and 16</u>	<u>P/A</u>	<u>source test</u>
	<u>BAAQMD Condition #14373, Part 2</u>	<u>Y</u>		<u>outlet</u> <u>NMHC concentration of 10 ppm or less; if inlet concentration > 2000 ppm then destruction efficiency of at least 98.5%; if inlet concentration is between 200 & 2000 ppm then destruction efficiency of at least 97%; if inlet concentration < 200 ppm then destruction efficiency of at least 90%</u>	<u>BAAQMD Condition #14373 part 8</u>	<u>P/M</u>	<u>Collection System Integrity Inspection</u>
	<u>BAAQMD Condition #14373, Part 3</u>	<u>Y</u>		<u>Non-complying materials must be abated by A-2 &/or A-3</u>	<u>BAAQMD Condition #14373 Part 4</u>	<u>C</u>	<u>Temperature Chart Recorder</u>

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII - A
Applicable Limits and Compliance Monitoring Requirements
S-22 6-COLOR FLEXOGRAPHIC PRESS P-4
S-23 DRYING OVEN AT PRESS P-4

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission-Limit Citation</u>	FE Y/N	Future Effective Date	<u>Emission-Limit</u>	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	<u>BAAQMD Condition #14373, Part 5</u>	<u>Y</u>		<u>Minimum A-2 &/or A3 inlet catalyst cell temperature of 500°F or inlet catalyst cell temperature as established by most recent source test demonstrating compliance</u>	<u>BAAQMD Condition #14373 Part 6</u>	<u>C</u>	<u>Temperature Chart Recorder</u>
	<u>BAAQMD Condition #14373, part 7</u>	<u>Y</u>		<u>Allowable temperature excursion from A-2 & /or A3 operating temperature limit</u>	<u>BAAQMD Condition #14373 Part 6</u>	<u>P/M</u>	<u>Temperature chart recorder</u>
	<u>BAAQMD Condition #14373 Part 10</u>	<u>Y</u>		<u>Maximum VOC emissions not to exceed 39 TPY</u>	<u>BAAQMD Condition #14373 part 12</u>	<u>P/D</u>	<u>usage records, calculations</u>
	<u>BAAQMD Condition #20229 Part 1</u>	<u>Y</u>		<u>Single HAPs not to exceed 9 TPY and combine HAPS of no more than 23 TPY</u>	<u>BAAQMD Condition #20229 part 2</u>	<u>P/D</u>	<u>usage records, calculations</u>
HAP	40 CFR Part 63, Subpart KK, Section 63.825(b)	<u>Y</u>		Each affected source's HAP emissions not to exceed 5% of HAP applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	<u>P/M</u>	<u>Material usage records and certified product data sheets</u>
	40 CFR Part 63, Subpart KK, Section 63.825(b)	<u>Y</u>		Each affected source's HAP emissions not to exceed 4% of mass of all organic-containing materials applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	<u>P/M</u>	<u>Material usage records and certified product data sheets</u>

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII - A
Applicable Limits and Compliance Monitoring Requirements
S-22 6-COLOR FLEXOGRAPHIC PRESS P-4
S-23 DRYING OVEN AT PRESS P-4

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission-Limit Citation</u>	FE Y/N	Future Effective Date	<u>Emission-Limit</u>	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed 20% of the mass of solids applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed a calculated equivalent allowable mass based on the organic HAP and solids content of all materials applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
<u>HAPs</u>	40 CFR Part 63, Subpart KK, Section 63.820(a)(2)	Y		Each affected source's HAP emissions not to exceed 10 TPY for a single HAP and a combined HAPs of 25 TPY	40 CFR Part 63, Subpart KK, Section 63.829(d) & 63.830(b)(1)	P/M	<u>HAP</u> Material usage records and certified product data sheets

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – B
Applicable Limits and Compliance Monitoring Requirements
S-26 Flexographic Printing Press P-5 w/Between-Color Dryers and Tunnel Dryer

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission-Limit Citation</u>	FE Y/N	Future Effective Date	<u>Emission-Limit</u>	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-302	Y		2.5 lb VOC/gal of ink and coating	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #15238, part 3	C	Mechanical interlock system
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	<u>BAAQMD Condition #14373 Parts 15 and 16</u>	<u>P/A</u>	<u>source test</u>
	SIP 8-20-302	Y		2.5 lb VOC/gal of ink, coating, and adhesive	BAAQMD 8-20-503	P/M	Coating records
	<u>SIP 8-20-308</u>	<u>Y</u>		<u>75% (wt) or greater overall VOC collection and control efficiency</u>	<u>BAAQMD Condition #14373 Parts 15 and 16</u>	<u>P/A</u>	<u>source test</u>
	BAAQMD Condition #15238, Part 1	Y		6000 lbs/yr net VOC Usage from waterborne ink and makeup solvent	BAAQMD Condition #15238, part 10	P/M	Waterborne Ink & makeup solvent records
	BAAQMD Condition #15238, Part 2	Y		254,720 lbs/yr net VOC Usage from solventborne ink and makeup solvent	BAAQMD Condition #15238, part 10	P/M	Solvent-borne ink & makeup solvent records

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – B
Applicable Limits and Compliance Monitoring Requirements
S-26 Flexographic Printing Press P-5 w/Between-Color Dryers and Tunnel Dryer

Type of Limit Pollutant	Citation of Limit/Emission Limit on Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Condition #15238, Part 3	Y		2,000 lb/yr net waterborne metallic ink usage	BAAQMD Condition #15238, part 10	P/M	Solvent- borne ink & makeup solvent records
	BAAQMD Condition #15238, Part 4	Y		8,000 lbs/yr net organic solvent usage	BAAQMD Condition #15238, part 10	P/M	Solvent- borne ink & makeup solvent records
VOC	BAAQMD Condition #15238, Part 5	Y		39 tons/yr	BAAQMD Condition #15238, part 10	P/M	Ink, makeup solvent, & cleanup solvent records
	BAAQMD Condition #15238, Part 7	Y		75% (wt) or greater overall VOC capture and destruction efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	BAAQMD Condition #15238, Part 7	Y		75% (wt) or greater overall VOC capture and destruction efficiency	BAAQMD Condition #15238, part 8	C	Mechanical interlock system
	BAAQMD Condition #15238, Part 10			1.0 lb VOC/gal of waterborne inks	BAAQMD Condition #15238, Part 11	P/M	Coating records

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – B
Applicable Limits and Compliance Monitoring Requirements
S-26 Flexographic Printing Press P-5 w/Between-Color Dryers and Tunnel Dryer

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit/Emission Limit</u> <u>Citation</u>	<u>FE</u> <u>Y/N</u>	<u>Future Effective Date</u>	<u>Emission Limit</u>	<u>Monitoring Requirement Citation</u>	<u>Monitoring Frequency (P/C/N)</u>	<u>Monitoring Type</u>
VOC	BAAQMD Condition #15238, Part 1	Y		39 tons/yr	BAAQMD Condition #15238, part 6	P/M	Ink, makeup solvent, & cleanup solvent records, calculations
	BAAQMD Condition #15238, Part 2	Y		S-26 to be abated by A-2 &/or A-3	BAAQMD 8-20-308	C	Temperature Gauge
	BAAQMD Condition #15238, Part 3	Y		75% (wt) or greater overall VOC capture and destruction efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	BAAQMD Condition #15238, Part 3	Y		75% (wt) or greater overall VOC capture and destruction efficiency	BAAQMD Condition #14373 Parts 15 and 16	P/A	source test
	BAAQMD Condition #15238, Part 5			1.0 lb VOC/gal of waterborne inks	BAAQMD Condition #15238, Part 6	P/M	Coating records
	BAAQMD Condition #20229, Part 1			Single HAPs of less than 9 TPY and combine HAPs of 23 TPY	BAAQMD Condition #20229, Part 2	P/M	Coating records, calculations
HAP	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed 5% of HAP applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – B
Applicable Limits and Compliance Monitoring Requirements
S-26 Flexographic Printing Press P-5 w/Between-Color Dryers and Tunnel Dryer

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit/Emission Limit</u> <u>Citation</u>	<u>FE</u> <u>Y/N</u>	<u>Future Effective Date</u>	<u>Emission Limit</u>	<u>Monitoring Requirement Citation</u>	<u>Monitoring Frequency (P/C/N)</u>	<u>Monitoring Type</u>
	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed 4% of mass of all organic-containing materials applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
HAP	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed 20% of the mass of solids applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed a calculated equivalent allowable mass based on the organic HAP and solids content of all materials applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
HAPs	40 CFR Part 63, Subpart KK, Section 63.820(a)(2)	Y		Each affected source's HAP emissions not to exceed 10 TPY for a single HAP and a combined HAPs of 25 TPY	40 CFR Part 63, Subpart KK, Section 63.829(d) & 63.830(b)(1)	P/M	HAP Material usage records and certified product data sheets

VII. Applicable Limits and Compliance Monitoring Requirements

Table VI-E
Applicable Limits and Compliance Monitoring Requirements
~~S-11 GRAVURE STATION #1 AT COATER #14~~
~~S-12 GRAVURE STATION #2 AT COATER #14~~
~~S-13 DRYING OVEN #1 AT COATER #14~~
~~S-14 DRYING OVEN #2 AT COATER #14~~
~~S-15 DRYING OVEN #3 AT COATER #14~~

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-302	Y		2.5 lb VOC/gallon of ink and coating	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-302	Y		1.25 lb VOC/gallon of adhesive	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge
VOC	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 2	C	Mechanical interlock system
	BAAQMD 8-20-309	N		Cleaning Product VOC content limit of 6.7 lb/gal and VOC composite vapor pressure limit of 25 mm Hg @20°C	BAAQMD 8-20-503	P/M	Cleaning Product Records
	SIP 8-20-302	Y		2.5 lb VOC/gal of ink, coating, and adhesive	BAAQMD 8-20-503	P/M	Coating records
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 2	C	Mechanical interlock system
	BAAQMD Condition #14373, Part 1(b)	Y		90% (wt) or greater VOC destruction efficiency	BAAQMD Condition #14373 part 4	C	Temperature Chart Recorder

VII. Applicable Limits and Compliance Monitoring Requirements

Table VI—E
~~Applicable Limits and Compliance Monitoring Requirements~~
~~S-11 GRAVURE STATION #1 AT COATER #14~~
~~S-12 GRAVURE STATION #2 AT COATER #14~~
~~S-13 DRYING OVEN #1 AT COATER #14~~
~~S-14 DRYING OVEN #2 AT COATER #14~~
~~S-15 DRYING OVEN #3 AT COATER #14~~

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Condition #14373, Part 3	Y		Minimum A-2 inlet-catalyst-cell temperature of 500°F	BAAQMD Condition #14373 part 4	C	Temperature Chart Recorder
HAP	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed 5% of HAP applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed 4% of mass of all organic- containing materials applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed 20% of the mass of solids applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed a calculated equivalent allowable mass based on the organic HAP and solids content of all materials applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – C
Applicable Limits and Compliance Monitoring Requirements
S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11
S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11

<u>Type of Limit</u> Pollutant	<u>Citation of Limit</u> Emission-Limit Citation	FE Y/N	Future Effective Date	Emission-Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-302	Y		2.5 lb VOC/gal of ink and coating	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-302	Y		1.25 lb VOC/gal of adhesive	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 2	C	Mechanical interlock system
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	<u>BAAQMD</u> <u>Condition</u> <u>#14373 Parts</u> <u>15 and 16</u>	<u>P/A</u>	<u>source test</u>
	BAAQMD 8-20-309	N		Cleaning Product VOC content limit of 7.4 lb/gal and VOC composite vapor pressure limit of 25 mm Hg @ 20°C	BAAQMD 8-20-503	P/M	Cleaning Product Records
	SIP 8-20-302	Y		2.5 lb VOC/gal of ink, coating, and adhesive	BAAQMD 8-20-503	P/M	Coating records
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – C
Applicable Limits and Compliance Monitoring Requirements
S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11
S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11

<u>Type of Limit</u> Pollutant	<u>Citation of Limit</u> Emission-Limit Citation	FE Y/N	Future Effective Date	Emission-Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 4	C	Mechanical interlock system
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	<u>BAAQMD Condition #14373 Parts 15 and 16</u>	<u>P/A</u>	<u>source test</u>
VOC	BAAQMD Condition #14373, part 1(e)	Y		75% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part 4	C	Temperature Chart Recorder
VOC	BAAQMD Condition #14373, part 1(e)	Y		75% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part 2	C	Mechanical interlock system
	BAAQMD Condition #14373, part 1(e)	Y		75% (wt) or greater overall VOC collection and destruction efficiency	BAAQMD Condition #14373 Part 6	P/M	Collection System Integrity Inspection
	BAAQMD Condition #14373, Part 3	Y		Minimum A-2 inlet catalyst cell temperature of 500°F	BAAQMD Condition #14373 Part 4	C	Temperature Chart Recorder
VOC	<u>BAAQMD Condition #14373, part 1b</u>	<u>Y</u>		<u>87.3% (wt) or greater overall VOC collection and destruction efficiency</u>	<u>BAAQMD Condition #14373 Part 6</u>	<u>C</u>	<u>Temperature Chart Recorder</u>

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – C
Applicable Limits and Compliance Monitoring Requirements
S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11
S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission-Limit</u> <u>Citation</u>	<u>FE</u> <u>Y/N</u>	<u>Future</u> <u>Effective</u> <u>Date</u>	<u>Emission-Limit</u>	<u>Monitoring</u> <u>Requirement</u> <u>Citation</u>	<u>Monitoring</u> <u>Frequency</u> <u>(P/C/N)</u>	<u>Monitoring</u> <u>Type</u>
<u>VOC</u>	<u>BAAQMD</u> <u>Condition #14373.</u> <u>part 1b</u>	<u>Y</u>		<u>87.3% (wt) or greater</u> <u>overall VOC collection and</u> <u>destruction efficiency</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>Part 4</u>	<u>C</u>	<u>Mechanical</u> <u>interlock</u> <u>system</u>
	<u>BAAQMD</u> <u>Condition #14373.</u> <u>part 1b</u>	<u>Y</u>		<u>87.3% (wt) or greater</u> <u>overall VOC collection and</u> <u>destruction efficiency</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>Part 8</u>	<u>P/M</u>	<u>Collection</u> <u>System</u> <u>Integrity</u> <u>Inspection</u>
	<u>BAAQMD</u> <u>Condition #14373.</u> <u>part 1b</u>	<u>Y</u>		<u>87.3% (wt) or greater</u> <u>overall VOC collection and</u> <u>destruction efficiency</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373 Parts</u> <u>15 and 16</u>	<u>P/A</u>	<u>source test</u>
<u>VOC</u>	<u>BAAQMD</u> <u>Condition #14373.</u> <u>Part 2</u>	<u>Y</u>		<u>outlet</u> <u>NMHC concentration of 10</u> <u>ppm or less; if inlet</u> <u>concentration > 2000 ppm</u> <u>then destruction efficiency</u> <u>of at least 98.5%; if inlet</u> <u>concentration is between</u> <u>200 & 2000 ppm then</u> <u>destruction efficiency of at</u> <u>least 97%; if inlet</u> <u>concentration < 200 ppm</u> <u>then destruction efficiency</u> <u>of least 90%</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>part 4</u>	<u>C</u>	<u>Source/A-2</u> <u>and A-3</u> <u>interlock</u> <u>system</u>

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – C
Applicable Limits and Compliance Monitoring Requirements
S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11
S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission-Limit</u> <u>Citation</u>	<u>FE</u> <u>Y/N</u>	<u>Future</u> <u>Effective</u> <u>Date</u>	<u>Emission-Limit</u>	<u>Monitoring</u> <u>Requirement</u> <u>Citation</u>	<u>Monitoring</u> <u>Frequency</u> <u>(P/C/N)</u>	<u>Monitoring</u> <u>Type</u>
	<u>BAAQMD</u> <u>Condition #14373.</u> <u>Part 2</u>	<u>Y</u>		<u>outlet</u> <u>NMHC concentration of 10</u> <u>ppm or less; if inlet</u> <u>concentration > 2000 ppm</u> <u>then destruction efficiency</u> <u>of at least 98.5%; if inlet</u> <u>concentration is between</u> <u>200 & 2000 ppm then</u> <u>destruction efficiency of at</u> <u>least 97%; if inlet</u> <u>concentration < 200 ppm</u> <u>then destruction efficiency</u> <u>of least 90%</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>part 8</u>	<u>P/M</u>	<u>Collection</u> <u>System</u> <u>Integrity</u> <u>Inspection</u>
	<u>BAAQMD</u> <u>Condition #14373.</u> <u>Part 2</u>	<u>Y</u>		<u>outlet</u> <u>NMHC concentration of 10</u> <u>ppm or less; if inlet</u> <u>concentration > 2000 ppm</u> <u>then destruction efficiency</u> <u>of at least 98.5%; if inlet</u> <u>concentration is between</u> <u>200 & 2000 ppm then</u> <u>destruction efficiency of at</u> <u>least 97%; if inlet</u> <u>concentration < 200 ppm</u> <u>then destruction efficiency</u> <u>of least 90%</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373 Parts</u> <u>15 and 16</u>	<u>P/A</u>	<u>source test</u>
	<u>BAAQMD</u> <u>Condition #14373.</u> <u>Part 3</u>	<u>Y</u>		<u>Non-complying materials</u> <u>must be abated by A-2 &/or</u> <u>A-3</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>Part 4</u>	<u>C</u>	<u>Temperature</u> <u>Chart</u> <u>Recorder</u>

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – C
Applicable Limits and Compliance Monitoring Requirements
S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11
S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission-Limit</u> <u>Citation</u>	<u>FE</u> <u>Y/N</u>	<u>Future</u> <u>Effective</u> <u>Date</u>	<u>Emission-Limit</u>	<u>Monitoring</u> <u>Requirement</u> <u>Citation</u>	<u>Monitoring</u> <u>Frequency</u> <u>(P/C/N)</u>	<u>Monitoring</u> <u>Type</u>
	<u>BAAQMD</u> <u>Condition #14373</u> <u>Part 5</u>	<u>Y</u>		<u>Minimum</u> <u>A-2 &/or A3 inlet catalyst</u> <u>cell temperature of 500°F or</u> <u>inlet catalyst cell</u> <u>temperature as established</u> <u>by most recent source test</u> <u>demonstrating compliance</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>Part 6</u>	<u>C</u>	<u>Temperature</u> <u>Chart</u> <u>Recorder</u>
	<u>BAAQMD</u> <u>Condition #14373</u> <u>part 7</u>	<u>Y</u>		<u>Allowable temperature</u> <u>excursion from A-2 &/or</u> <u>A3 operating temperature</u> <u>limit</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>Part 6</u>	<u>P/M</u>	<u>Temperature</u> <u>chart</u> <u>recorder</u>
	<u>BAAQMD</u> <u>Condition #14373</u> <u>Part 10</u>	<u>Y</u>		<u>Maximum VOC emissions</u> <u>not to exceed 6.63 TPY</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>part 12</u>	<u>P/D</u>	<u>usage</u> <u>records,</u> <u>calculations</u>
	<u>BAAQMD</u> <u>Condition #20229</u> <u>Part 1</u>			<u>Single HAPs of less than 9</u> <u>TPY and combine HAPs of</u> <u>23 TPY</u>	<u>BAAQMD</u> <u>Condition</u> <u>#20229</u> <u>Part2</u>	<u>P/M</u>	<u>Coating</u> <u>records,</u> <u>calculations</u>
<u>HAP</u>	<u>40 CFR Part 63,</u> <u>Subpart KK,</u> <u>Section 63.825(b)</u>	<u>Y</u>		<u>Each affected source's HAP</u> <u>emissions not to exceed 5%</u> <u>of HAP applied for the</u> <u>month</u>	<u>40 CFR Part</u> <u>63, Subpart</u> <u>KK, Section</u> <u>63.825(b)</u>	<u>P/M</u>	<u>Material</u> <u>usage</u> <u>records and</u> <u>certified</u> <u>product data</u> <u>sheets</u>
	<u>40 CFR Part 63,</u> <u>Subpart KK,</u> <u>Section 63.825(b)</u>	<u>Y</u>		<u>Each affected source's HAP</u> <u>emissions not to exceed 4%</u> <u>of mass of all organic-</u> <u>containing materials</u> <u>applied for the month</u>	<u>40 CFR Part</u> <u>63, Subpart</u> <u>KK, Section</u> <u>63.825(b)</u>	<u>P/M</u>	<u>Material</u> <u>usage</u> <u>records and</u> <u>certified</u> <u>product data</u> <u>sheets</u>

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – C
Applicable Limits and Compliance Monitoring Requirements
S-1 ROTOGRAVURE COATER AT EXTRUDER LAMINATOR #11
S-2 DRYING OVEN AT EXTRUDER LAMINATOR #11

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission-Limit</u> <u>Citation</u>	FE Y/N	Future Effective Date	<u>Emission-Limit</u>	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed 20% of the mass of solids applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
HAP	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed a calculated equivalent allowable mass based on the organic HAP and solids content of all materials applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
HAPs	40 CFR Part 63, Subpart KK, Section 63.820(a)(2)	Y		Each affected source's HAP emissions not to exceed 10 TPY for a single HAP and a combine HAP of 25 TPY	40 CFR Part 63, Subpart KK, Section 63.829(d) & 63.830(b)(1)	P/M	HAP Material usage records and certified product data sheets

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – D
Applicable Limits and Compliance Monitoring Requirements
S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15
S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission-Limit</u> <u>Citation</u>	FE Y/N	Future Effective Date	<u>Emission-Limit</u>	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-302	Y		2.5 lb VOC/gal of ink and coating	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-302	Y		1.25 lb VOC/gal of adhesive	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 2	C	Mechanical interlock system
	BAAQMD 8-20-308	N		75% (wt) or greater overall VOC collection and control efficiency	<u>BAAQMD</u> <u>Condition</u> <u>#14373 Parts</u> <u>15 and 16</u>	<u>P/A</u>	<u>source test</u>
	BAAQMD 8-20-309	N		Cleaning Product VOC content limit of 7.4 lb/gal and VOC composite vapor pressure limit of 25 mm Hg @ 20°C	BAAQMD 8-20-503	P/M	Cleaning Product Records
VOC	SIP 8-20-302	Y		2.5 lb VOC/gal of ink, coating, and adhesive	BAAQMD 8-20-503	P/M	Coating records
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 2	C	Mechanical interlock system

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – D
Applicable Limits and Compliance Monitoring Requirements
S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15
S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission-Limit</u> <u>Citation</u>	FE Y/N	Future Effective Date	<u>Emission-Limit</u>	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD Condition #14373, part 1(e)	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 4	C	Temperature Chart Recorder
	BAAQMD Condition #14373, part 1(e)	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 2	C	Mechanical interlock system
	BAAQMD Condition #14373, part 1(e)	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 6	P/M	Collection System Integrity Inspection
	BAAQMD Condition #14373, Part 3	Y		A-2 inlet catalyst cell temperature as established by most recent source test demonstrating compliance	BAAQMD Condition #14373 Part 4	C	Temperature Chart Recorder
	BAAQMD Condition #14373, part 5	Y		Allowable temperature excursion from A-2 operating temperature limit	BAAQMD Condition #14373 Part 6	P/M	Records of qualifying temperature excursions
<u>VOC</u>	<u>BAAQMD</u> <u>Condition #14373,</u> <u>part 1a</u>	<u>Y</u>		<u>75% (wt) or greater overall</u> <u>VOC collection and</u> <u>control efficiency</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>Part 6</u>	<u>C</u>	<u>Temperature</u> <u>Chart</u> <u>Recorder</u>
	<u>BAAQMD</u> <u>Condition #14373,</u> <u>part 1a</u>	<u>Y</u>		<u>75% (wt) or greater overall</u> <u>VOC collection and</u> <u>control efficiency</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>Part 4</u>	<u>C</u>	<u>Mechanical</u> <u>interlock</u> <u>system</u>

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – D
Applicable Limits and Compliance Monitoring Requirements
S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15
S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission-Limit</u> <u>Citation</u>	<u>FE</u> <u>Y/N</u>	<u>Future</u> <u>Effective</u> <u>Date</u>	<u>Emission-Limit</u>	<u>Monitoring</u> <u>Requirement</u> <u>Citation</u>	<u>Monitoring</u> <u>Frequency</u> <u>(P/C/N)</u>	<u>Monitoring</u> <u>Type</u>
	<u>BAAQMD</u> <u>Condition #14373.</u> <u>part 1a</u>	<u>Y</u>		<u>75% (wt) or greater overall</u> <u>VOC collection and</u> <u>control efficiency</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>Part 8</u>	<u>P/M</u>	<u>Collection</u> <u>System</u> <u>Integrity</u> <u>Inspection</u>
	<u>BAAQMD</u> <u>Condition #14373.</u> <u>part 1a</u>	<u>Y</u>		<u>75% (wt) or greater overall</u> <u>VOC collection and</u> <u>control efficiency</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373 Parts</u> <u>15 and 16</u>	<u>P/A</u>	<u>source test</u>
	<u>BAAQMD</u> <u>Condition #14373.</u> <u>Part 2</u>	<u>Y</u>		<u>outlet</u> <u>NMHC concentration of 10</u> <u>ppm or less; if inlet</u> <u>concentration > 2000 ppm</u> <u>then destruction efficiency</u> <u>of at least 98.5%; if inlet</u> <u>concentration is between</u> <u>200 & 2000 ppm then</u> <u>destruction efficiency of at</u> <u>least 97%; if inlet</u> <u>concentration < 200 ppm</u> <u>then destruction efficiency</u> <u>of least 90%</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>part 4</u>	<u>C</u>	<u>Source/A-2</u> <u>and A-3</u> <u>interlock</u> <u>system</u>

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – D
Applicable Limits and Compliance Monitoring Requirements
S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15
S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission-Limit</u> <u>Citation</u>	<u>FE</u> <u>Y/N</u>	<u>Future</u> <u>Effective</u> <u>Date</u>	<u>Emission-Limit</u>	<u>Monitoring</u> <u>Requirement</u> <u>Citation</u>	<u>Monitoring</u> <u>Frequency</u> <u>(P/C/N)</u>	<u>Monitoring</u> <u>Type</u>
	<u>BAAQMD</u> <u>Condition #14373.</u> <u>Part 2</u>	<u>Y</u>		<u>outlet</u> <u>NMHC concentration of 10</u> <u>ppm or less; if inlet</u> <u>concentration > 2000 ppm</u> <u>then destruction efficiency</u> <u>of at least 98.5%; if inlet</u> <u>concentration is between</u> <u>200 & 2000 ppm then</u> <u>destruction efficiency of at</u> <u>least 97%; if inlet</u> <u>concentration < 200 ppm</u> <u>then destruction efficiency</u> <u>of least 90%</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>part 8</u>	<u>P/M</u>	<u>Collection</u> <u>System</u> <u>Integrity</u> <u>Inspection</u>
	<u>BAAQMD</u> <u>Condition #14373.</u> <u>Part 2</u>	<u>Y</u>		<u>outlet</u> <u>NMHC concentration of 10</u> <u>ppm or less; if inlet</u> <u>concentration > 2000 ppm</u> <u>then destruction efficiency</u> <u>of at least 98.5%; if inlet</u> <u>concentration is between</u> <u>200 & 2000 ppm then</u> <u>destruction efficiency of at</u> <u>least 97%; if inlet</u> <u>concentration < 200 ppm</u> <u>then destruction efficiency</u> <u>of least 90%</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373 Parts</u> <u>15 and 16</u>	<u>P/A</u>	<u>source test</u>
	<u>BAAQMD</u> <u>Condition #14373.</u> <u>Part 3</u>	<u>Y</u>		<u>Non-complying materials</u> <u>must be abated by A-2 &/or</u> <u>A-3</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>Part 4</u>	<u>C</u>	<u>Temperature</u> <u>Chart</u> <u>Recorder</u>

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – D
Applicable Limits and Compliance Monitoring Requirements
S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15
S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission-Limit</u> <u>Citation</u>	<u>FE</u> <u>Y/N</u>	<u>Future</u> <u>Effective</u> <u>Date</u>	<u>Emission-Limit</u>	<u>Monitoring</u> <u>Requirement</u> <u>Citation</u>	<u>Monitoring</u> <u>Frequency</u> <u>(P/C/N)</u>	<u>Monitoring</u> <u>Type</u>
	<u>BAAQMD</u> <u>Condition #14373</u> <u>Part 5</u>	<u>Y</u>		<u>Minimum</u> <u>A-2 &/or A3 inlet catalyst</u> <u>cell temperature of 500°F or</u> <u>inlet catalyst cell</u> <u>temperature as established</u> <u>by most recent source test</u> <u>demonstrating compliance</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>Part 6</u>	<u>C</u>	<u>Temperature</u> <u>Chart</u> <u>Recorder</u>
	<u>BAAQMD</u> <u>Condition #14373</u> <u>part 7</u>	<u>Y</u>		<u>Allowable temperature</u> <u>excursion from A-2 &/or</u> <u>A3 operating temperature</u> <u>limit</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>Part 6</u>	<u>P/M</u>	<u>Temperature</u> <u>chart</u> <u>recorder</u>
	<u>BAAQMD</u> <u>Condition #20229</u> <u>Part 1</u>			<u>Single HAPs of less than 9</u> <u>TPY and combine HAPs of</u> <u>23 TPY</u>	<u>BAAQMD</u> <u>Condition</u> <u>#20229</u> <u>Part 2</u>	<u>P/M</u>	<u>Coating</u> <u>records</u> <u>calculations</u>
<u>HAP</u>	<u>40 CFR Part 63,</u> <u>Subpart KK,</u> <u>Section 63.825(b)</u>	<u>Y</u>		<u>Each affected source's HAP</u> <u>emissions not to exceed 5%</u> <u>of HAP applied for the</u> <u>month</u>	<u>40 CFR Part</u> <u>63, Subpart</u> <u>KK, Section</u> <u>63.825(b)</u>	<u>P/M</u>	<u>Material</u> <u>usage</u> <u>records and</u> <u>certified</u> <u>product data</u> <u>sheets</u>
<u>HAP</u>	<u>40 CFR Part 63,</u> <u>Subpart KK,</u> <u>Section 63.825(b)</u>	<u>Y</u>		<u>Each affected source's HAP</u> <u>emissions not to exceed 4%</u> <u>of mass of all organic-</u> <u>containing materials</u> <u>applied for the month</u>	<u>40 CFR Part</u> <u>63, Subpart</u> <u>KK, Section</u> <u>63.825(b)</u>	<u>P/M</u>	<u>Material</u> <u>usage</u> <u>records and</u> <u>certified</u> <u>product data</u> <u>sheets</u>

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – D
Applicable Limits and Compliance Monitoring Requirements
S-17 PRINTER STATION #1 AT EXTRUDER LAMINATOR #15
S-18 DRYING OVEN #1 AT EXTRUDER LAMINATOR #15

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission-Limit</u> <u>Citation</u>	FE Y/N	Future Effective Date	<u>Emission-Limit</u>	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed 20% of the mass of solids applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed a calculated equivalent allowable mass based on the organic HAP and solids content of all materials applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
HAPs	40 CFR Part 63, Subpart KK, Section 63.820(a)(2)	Y		Each affected source's HAP emissions not to exceed 10 TPY for a single HAP and a combine HAP of 25 TPY	40 CFR Part 63, Subpart KK, Section 63.829(d) & 63.830(b)(1)	P/M	HAP Material usage records and certified product data sheets

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – E
Applicable Limits and Compliance Monitoring Requirements
S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15
S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission Limit</u> <u>Citation</u>	FE Y/N	Future Effective Date	<u>Emission Limit</u>	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-20-302	Y		2.5 lb VOC/gal of ink and coating	BAAQMD 8-20-503	P/M	Coating records
	BAAQMD 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	BAAQMD 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	<u>BAAQMD Condition #14373 Parts 15 and 16</u>	<u>P/A</u>	<u>source test</u>
	SIP 8-20-302	Y		2.5 lb VOC/gal of ink, coating, and adhesive	BAAQMD 8-20-503	P/M	Coating records
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD 8-20-505	C	Temperature Gauge
	SIP 8-20-308	Y		75% (wt) or greater overall VOC collection and control efficiency	<u>BAAQMD Condition #14373 Parts 15 and 16</u>	<u>P/A</u>	<u>source test</u>
VOC	BAAQMD Condition #14373, Part 1(a)	Y		90% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 part 4	C	Temperature Chart Recorder
	BAAQMD Condition #14373, Part 1(a)	Y		90% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 part 2	C	Source/A-2 interlock system
	BAAQMD Condition #14373, Part 1(a)	Y		90% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 part 6	P/M	Collection System Integrity Inspection

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – E
Applicable Limits and Compliance Monitoring Requirements
S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15
S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15

Type of Limit Pollutant	Citation of Limit Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Condition #14373, Part 3	Y		Minimum A-2 inlet catalyst cell temperature of 500°F	BAAQMD Condition #14373 part 4	C	Temperature Chart Recorder
	BAAQMD Condition #14373, Part 8	Y		140 lbs/day or 12.3 tons/yr	BAAQMD Condition #14373, part 7	P/D	Primer, coatings, makeup solvent, & cleanup solvent records
VOC	BAAQMD Condition #14373, part 1a	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 6	C	Temperature Chart Recorder
	BAAQMD Condition #14373, part 1a	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 4	C	Mechanical interlock system
	BAAQMD Condition #14373, part 1a	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Part 8	P/M	Collection System Integrity Inspection
	BAAQMD Condition #14373, part 1a	Y		75% (wt) or greater overall VOC collection and control efficiency	BAAQMD Condition #14373 Parts 15 and 16	P/A	source test

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – E
Applicable Limits and Compliance Monitoring Requirements
S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15
S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission-Limit</u> <u>Citation</u>	<u>FE</u> <u>Y/N</u>	<u>Future Effective Date</u>	<u>Emission-Limit</u>	<u>Monitoring Requirement</u> <u>Citation</u>	<u>Monitoring Frequency</u> <u>(P/C/N)</u>	<u>Monitoring Type</u>
	<u>BAAQMD</u> <u>Condition</u> <u>#14373,</u> <u>Part 2</u>	<u>Y</u>		<u>outlet</u> <u>NMHC concentration of 10</u> <u>ppm or less; if inlet</u> <u>concentration > 2000 ppm</u> <u>then destruction efficiency</u> <u>of at least 98.5%; if inlet</u> <u>concentration is between</u> <u>200 & 2000 ppm then</u> <u>destruction efficiency of at</u> <u>least 97%; if inlet</u> <u>concentration < 200 ppm</u> <u>then destruction efficiency</u> <u>of at least 90%</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>part 4</u>	<u>C</u>	<u>Source/A-2</u> <u>and A-3</u> <u>interlock</u> <u>system</u>
	<u>BAAQMD</u> <u>Condition</u> <u>#14373,</u> <u>Part 2</u>	<u>Y</u>		<u>outlet</u> <u>NMHC concentration of 10</u> <u>ppm or less; if inlet</u> <u>concentration > 2000 ppm</u> <u>then destruction efficiency</u> <u>of at least 98.5%; if inlet</u> <u>concentration is between</u> <u>200 & 2000 ppm then</u> <u>destruction efficiency of at</u> <u>least 97%; if inlet</u> <u>concentration < 200 ppm</u> <u>then destruction efficiency</u> <u>of at least 90%</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>part 8</u>	<u>P/M</u>	<u>Collection</u> <u>System</u> <u>Integrity</u> <u>Inspection</u>

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – E
Applicable Limits and Compliance Monitoring Requirements
S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15
S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission-Limit</u> <u>Citation</u>	<u>FE</u> <u>Y/N</u>	<u>Future Effective Date</u>	<u>Emission-Limit</u>	<u>Monitoring Requirement</u> <u>Citation</u>	<u>Monitoring Frequency</u> <u>(P/C/N)</u>	<u>Monitoring Type</u>
	<u>BAAQMD</u> <u>Condition</u> <u>#14373,</u> <u>Part 2</u>	<u>Y</u>		<u>outlet</u> <u>NMHC concentration of 10</u> <u>ppm or less; if inlet</u> <u>concentration > 2000 ppm</u> <u>then destruction efficiency</u> <u>of at least 98.5%; if inlet</u> <u>concentration is between</u> <u>200 & 2000 ppm then</u> <u>destruction efficiency of at</u> <u>least 97%; if inlet</u> <u>concentration < 200 ppm</u> <u>then destruction efficiency</u> <u>of at least 90%</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373 Parts</u> <u>15 and 16</u>	<u>P/A</u>	<u>source test</u>
	<u>BAAQMD</u> <u>Condition</u> <u>#14373,</u> <u>Part 3</u>	<u>Y</u>		<u>Non-complying materials</u> <u>must be abated by A-2 &/or</u> <u>A-3</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>Part 4</u>	<u>C</u>	<u>Temperature</u> <u>Chart</u> <u>Recorder</u>
	<u>BAAQMD</u> <u>Condition</u> <u>#14373,</u> <u>Part 5</u>	<u>Y</u>		<u>Minimum</u> <u>A-2 &/or A3 inlet catalyst</u> <u>cell temperature of 500°F or</u> <u>inlet catalyst cell</u> <u>temperature as established</u> <u>by most recent source test</u> <u>demonstrating compliance</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>Part 6</u>	<u>C</u>	<u>Temperature</u> <u>Chart</u> <u>Recorder</u>
	<u>BAAQMD</u> <u>Condition</u> <u>#14373, part</u> <u>7</u>	<u>Y</u>		<u>Allowable temperature</u> <u>excursion from A-2 &/or</u> <u>A3 operating temperature</u> <u>limit</u>	<u>BAAQMD</u> <u>Condition</u> <u>#14373</u> <u>Part 6</u>	<u>P/M</u>	<u>Temperature</u> <u>chart</u> <u>recorder</u>

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – E
Applicable Limits and Compliance Monitoring Requirements
S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15
S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15

Type of Limit Pollutant	Citation of Limit Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Condition #14373, Part 11	Y		12.3 tons/yr	BAAQMD Condition #14373, part 12	P/D	Primer, coatings, makeup solvent, & cleanup solvent records, calculations
	BAAQMD Condition #20229 Part 1			Single HAPs of less than 9 TPY and combine HAPs of 23 TPY	BAAQMD Condition #20229 Part 2	P/M	Coating records, calculations
HAP	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed 5% of HAP applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed 4% of mass of all organic- containing materials applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed 20% of the mass of solids applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets

VII. Applicable Limits and Compliance Monitoring Requirements

Table VII – E
Applicable Limits and Compliance Monitoring Requirements
S-24 PRIMER STATION #2 AT EXTRUDER LAMINATOR #15
S-25 DRYING OVEN #2 AT EXTRUDER LAMINATOR #15

<u>Type of Limit</u> <u>Pollutant</u>	<u>Citation of Limit</u> <u>Emission-Limit Citation</u>	FE Y/N	Future Effective Date	<u>Emission-Limit</u>	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	40 CFR Part 63, Subpart KK, Section 63.825(b)	Y		Each affected source's HAP emissions not to exceed a calculated equivalent allowable mass based on the organic HAP and solids content of all materials applied for the month	40 CFR Part 63, Subpart KK, Section 63.825(b)	P/M	Material usage records and certified product data sheets
HAPs	40 CFR Part 63, Subpart KK, Section 63.820(a)(2)	Y		Each affected source's HAP emissions not to exceed 10 TPY for a single HAP and a combine HAP of 25 TPY	40 CFR Part 63, Subpart KK, Section 63.829(d) & 63.830(b)(1)	P/M	HAP Material usage records and certified product data sheets

VIII. TEST METHODS

The test methods associated with the emission limit of a District regulation are generally referenced in Section 600 et seq. of the regulation. The following table indicates only the test methods associated with the emission limits referenced in Section VII, Applicable Emission Limits & Compliance Monitoring Requirements, of this permit.

Table VIII
Test Methods

Applicable Requirement	Description of Requirement	Acceptable Test Methods
BAAQMD 6-301	Ringelmann No. 1 Limitation	Manual of Procedures, Volume I, Evaluation of Visible Emissions
BAAQMD 6-310	Particulate Weight Limitation	Manual of Procedures, Volume IV, ST-15, Particulates Sampling
BAAQMD 8-20-302	Ink and Coating VOC Content Limitations	Manual of Procedures, Volume III, Method 21, “Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings” or Method 22, ““Determination of Compliance of Volatile Organic Compounds for Solvent Based Coating”
SIP 8-20-308	Approved Emission Control System Requirements	Manual of Procedures, Volume IV, ST-7 or EPA Method 25 or 25A
BAAQMD 8-20-309	Cleaning Product Requirements	Manual of Procedures, Volume III, Method 31

IX. PERMIT SHIELD

Not Applicable

X. GLOSSARY

ACT
Federal Clean Air Act

BAAQMD
Bay Area Air Quality Management District

BACT
Best Available Control Technology

CAA
The federal Clean Air Act

CAAQS
California Ambient Air Quality Standards

CEQA
California Environmental Quality Act

CFR
The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

CO
Carbon Monoxide

Cumulative Increase
The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Used to determine whether threshold-based requirements are triggered.

District
The Bay Area Air Quality Management District

EPA
The federal Environmental Protection Agency.

Excluded
Not subject to any District Regulations.

Federally Enforceable, FE
All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60₅ (NSPS), Part 61₅ (NESHAPs), Part 63 (HAP), and Part 72 (Permits

X. Glossary

Regulation, Acid Rain), and also including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

HAP

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by both 40 CFR Part 63, ~~and District Regulation 2, Rule 5.~~

Major Facility

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60 (NSPS), Part 61 (NESHAPs), Part 63 (HAP), and Part 72 (Permits Regulation, Acid Rain), and also including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

~~A facility with potential emissions of regulated air pollutants greater than or equal to 100 tons per year, greater than or equal to 10 tons per year of any single hazardous air pollutant, and/or greater than or equal to 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity as determined by the EPA administrator.~~

MFR

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Act and implemented by District Regulation 2, Rule 6.

MOP

The District's Manual of Procedures.

NAAQS

National Ambient Air Quality Standards

NESHAPs

National Emission Standards for Hazardous Air Pollutants. ~~Contained See~~ in 40 CFR Part 61.

NMHC

Non-methane Hydrocarbons

NO_x

Oxides of nitrogen.

NSPS

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Act, and implemented by ~~both~~ 40 CFR Part 60 and District Regulation 10.

NSR

New Source Review. A federal program for pre-construction review and permitting of new and modified sources of air pollutants for which the District is classified "non-attainment".

X. Glossary

Mandated by Title I of the Clean Air Act and implemented by 40 CFR Parts 51 and 52 as well as District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

Offset Requirement

A New Source Review requirement to provide federally enforceable emission offsets at a specified ratio for the emissions from a new or modified source and any pre-existing cumulative increase minus any onsite contemporaneous emission reduction credits. Applies to emissions of POC, NO_x, PM₁₀, and SO₂.

Phase II Acid Rain Facility

A facility that generates electricity for sale through fossil-fuel combustion and is not exempted by 40 CFR 72 from Titles IV and V of the Clean Air Act.

~~A facility that generates electricity for sale through fossil-fuel combustion and by virtue of certain other characteristics (defined in Regulation 2, Rule 6) is subject to Titles IV and V of the Clean Air Act.~~

POC

Precursor Organic Compounds

PM

Total Particulate Matter

PM₁₀

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

PSD

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

Synthetic Minor Operating Permit

A District operating permit that has been modified to include conditions imposing enforceable permit conditions on a facility or source. A synthetic minor operating permit is subject to all the provisions of District Regulations 1, 2, and 3, including, but not limited to, permitting, compliance, and fee requirements.

SIP

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

SO₂

Sulfur dioxide

X. Glossary

Title V

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

VOC

Volatile Organic Compounds

Units of Measure:

Bhp	=	brake-horsepower
Btu	=	British thermal unit
g	=	grams
gal	=	gallon
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m ²	=	square meter
min	=	minute
mm	=	million
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year

XI. APPLICABLE STATE IMPLEMENTATION PLAN

The Bay Area Air Quality Management District's portion of the State Implementation Plan can be found at EPA Region 9's website. The address is:

<http://yosemite1.epa.gov/r9/r9sips.nsf/California?ReadForm&Start=1&Count=30&Expand=3.1>

See Attachments